

IOWA

TWO-YEAR STRATEGIC PLAN

for

WAGNER-PEYSER

and

WORKFORCE INVESTMENT ACT

PROGRAMS

JULY 1, 2005 through JUNE 30, 2007

As the Governor, I certify that for the State of Iowa, for those activities and programs included in this plan that are under my jurisdiction, the agencies and officials designated under “Contact Information” have been duly designated to represent the state in the capacities indicated for the programs and activities indicated. Subsequent changes in the designation of officials will be provided to the designated program or activity contact as such changes occur. I further certify that, for those activities and programs included in this plan that are under my jurisdiction, we will operate the workforce development programs included in this two-year plan in accordance with this two-year plan and the assurance described in Section XI of this plan.

Thomas J. Vilsack, Governor

May 27, 2005
Date

TABLE OF CONTENTS

	Page
<u>Preface</u>	
Program Administration Designees	1
Plan Development Process	2
<u>Plan Content</u>	
I. State Vision	
A. Economic Development Goals	3
B. Leveraging Resources Among State Agencies	3
C. Ensuring Education/Training to Support a Skilled Workforce	4
D. Collaboration Efforts to Develop Innovative Strategies	5
E. Youth Opportunities	5
II. State Workforce Investment Priorities	
A. Governor's Key Workforce Investment Priorities	7
III. State Governance Structure	
A. Organization of State Agencies in Relation to the Governor	8
B. State Workforce Investment Board	8
C. Structure/Process for State Agency Communication/Collaboration	11
IV. Economic and Labor Market Analysis	
A. Iowa's Economic Base by Industry	14
B. Growth Projection	15
C. Industries in Demand of Workers	17
D. Critical Jobs/Occupations	19
E. Required Skills for Jobs	19
F. Labor Pool Demographics	19
G. Impact of In/Out Migration	20
H. Skill Gaps	20
I. Workforce Development Issues	21
J. Issues Critical to Economic Health/Growth	23
V. Overarching State Strategies	
A. Leveraging WIA Title 1 Funds	24
B. Strategies to Address Priorities	24
C. Strategies to Identify Target Industries/Occupations	25
D. Strategies to Promote/Develop Partnerships	26
E. Strategies to Support Training	27
F. Strategies to Support Small Business	29
G. Statewide Activity Funds	31
H. Strategies to Promote Collaboration	31

I.	Strategies to Identify Impediments	33
J.	WIA Waivers.....	33
VI.	Major State Policies and Requirements	
A.	Data Collection/Reporting, Information/Performance Management, etc.	34
B.	Use of Administrative Resources.....	34
C.	Universal Access and Consistency of Service	34
D.	Demand-Driven Workforce Investment System	35
E.	Job Corps and Apprenticeship Integration	36
VII.	Integration of One-Stop Service Delivery	
A.	Quality Assurance for One-Stop Centers	37
B.	Service Delivery Integration in the One-Stop	37
C.	Identifying One-Stop Infrastructure Costs	38
D.	One-Stop Support with Set-aside Funds	38
E.	Assured Focus on Business and Customer Needs.....	39
VIII.	Administration and Oversight of Local Workforce Investment System	
A.	Local Area Designations	40
B.	Local Workforce Investment Boards	41
C.	Building Capacity of Local Boards.....	41
D.	Local Planning Process	41
E.	Regional Planning	42
F.	Allocation Formulas.....	42
G.	Training Provider Selection and Certification Policies.....	44
H.	One-Stop Policies.....	46
I.	Oversight/Monitoring Process.....	48
J.	Grievance Procedures.....	49
K.	Policies the Facilitate Effective Local Workforce Investment Systems	50
IX.	Service Delivery	
A.	One-Stop Service Delivery Strategies.....	56
B.	Workforce Information	57
C.	Adults and Dislocated Workers.....	60
D.	Rapid Response	72
E.	Youth.....	74
F.	Business Services	76
G.	Innovative Service Delivery Strategies	77
H.	Faith-Based and Community Organizations	77
X.	State Administration	
A.	Infrastructure to Support One-Stop Activities	79
B.	Use of Funds Reserved for Statewide Activities.....	79
C.	Implementing Waivers	80
D.	Performance Management and Accountability	80
E.	Administrative Provisions	83

XI. Assurances..... 84**Attachments**

1.	State Workforce Board Membership Roster	87
2.	Local Board Appointment Process – WIA Handbook Chapter 4.	89
3.	Provider Eligibility/Program Certification Application.....	91
4.	Procurement Policy	95
5.	Regional Monitoring Responsibilities.....	100
6.	Grievance Procedures – WIA Handbook Chapter 24	103
7.	Incentive and Sanction Policy	108
8.	Non-discrimination Policy	110

PROGRAM ADMINISTRATION DESIGNEES AND PLAN SIGNATURES

WIA Title I Grant Recipient Agency:

Iowa Workforce Development
1000 E. Grand
Des Moines, IA 50319-0209
Phone: (515) 281-5387 Fax: (515) 242-6074
e-mail: IWD.CustomerService@iwd.state.ia.us

WIA Title I Signatory Official:

Richard V. Running, Director
1000 E. Grand
Des Moines, IA 50319-0209
Phone: (515) 281-5387 Fax: (515) 242-6074
e-mail: IWD.CustomerService@iwd.state.ia.us

WIA Title I Liaison

Richard V. Running, Director
1000 E. Grand
Des Moines, IA 50319-0209
Phone: (515) 281-5387 Fax: (515) 242-6074
e-mail: IWD.CustomerService@iwd.state.ia.us

Wagner-Peyser Act Grant Recipient/State Employment Security Agency:

Iowa Workforce Development
1000 E. Grand
Des Moines, IA 50319-0209
Phone: (515) 281-5387 Fax: (515) 242-6074
e-mail: IWD.CustomerService@iwd.state.ia.us

State Employment Security Administrator

Richard V. Running, Director
1000 E. Grand
Des Moines, IA 50319-0209
Phone: (515) 281-5387 Fax: (515) 242-6074
e-mail: IWD.CustomerService@iwd.state.ia.us

PLAN DEVELOPMENT PROCESS

The Governor and the State Workforce Development Board consider the development of this State Plan to be an on-going process. As such, the plan is not developed in a defined timeframe, or with the initiation of a few planning efforts and exercises. Instead, the vision, goals, objectives, and processes defined in the plan represent the current culmination of a variety of strategic planning efforts that incorporate the Governor's vision and goals for the State of Iowa, the Workforce Board's goals and objectives, and the departmental goals of Iowa Workforce Development.

The board has recently been involved in a series of strategic planning meetings and discussions, from which a basic vision and goals have emerged to provide direction to these planning efforts. In September 2004, the board co-sponsored a Workforce Summit with the Employers Council of Iowa to focus on current economic development and workforce issues in the state. Invitees to that meeting included Local Workforce Boards and Elected Officials.

The plan also incorporates recommendations and goals established through several enterprise-wide councils and taskforces established by the Governor. For example, this plan includes data and recommendations from reports of the Iowa 2010 taskforce, the Iowa Learns Council, and the 21st Century Workforce Council.

The State Workforce Board has opened and maintained lines of communication with state agency partners that are also involved in the education and training of Iowa's workforce and the economic development efforts in Iowa. Such conversations and exchanges of information have occurred with representative of the Departments of Education and Economic Development, Elder Affairs, and Human Services,

The plan includes the input of the local boards, partner agencies, and service providers. That input is gained through on-going communication with these entities, through their direct input into the planning process, and through their own planning efforts. In addition, agencies, service providers, program participants, and related constituencies of the employment and training system provide a constant and on-going source of input and information into the planning process.

On a more formal level, the State Workforce Board used a variety of approaches to gather input and provide an opportunity for comment on the State Plan. Upon initiation of the formal plan development process, the board sent letters to the Chairs of Local Workforce Boards, Chief Elected Officials, Employers' Councils of Iowa, and to state-level business and labor organizations. A Field Information Memo, the official communication tool within the workforce system, was issued to inform other workforce partners of the process. The board reviewed the draft plan at a public meeting, and the draft was posted on the Iowa Workforce Development website to solicit comments from interested parties and the general public. A public notice was also issued to announce the availability of the plan for review and comment. The board reviewed comments and incorporated those comments as appropriate prior to the final review and approval of the State Plan.

I. STATE VISION

Early in his tenure in the Iowa Senate, Governor Vilsack participated in the “Investing in People” policy academy sponsored by the National Association of State Legislatures. This effort concentrated on integrating education, workforce development, and economic development to make well paying employment opportunities available. Governor Vilsack has demonstrated a strong commitment to this goal. While still in the Senate, he negotiated the design of Iowa’s workforce development reform legislation with then-Governor Terry Branstad. The resulting law was passed with overwhelming bipartisan support and continues to provide the framework for workforce development in Iowa and its relationship to education and economic development.

A. Economic Development Goals

In 1999, the Iowa Department of Economic Development commissioned a private study to re-examine the industries upon which the state’s economic development resources were being targeted. This study, which relied heavily on data from Iowa Workforce Development’s workforce information shop, identified three broad targeted industry clusters for future investments. The clusters are:

- ◆ Advanced manufacturing;
- ◆ Life sciences (including such industries as biotechnology); and
- ◆ Information solutions (which includes information technology industries and industries such as financial services).

These clusters were selected based on several criteria. First, they involved so-called “basic” or “traded” industries that generate wealth for the state’s economy by selling products or services in interstate or international commerce. In addition, they are industries with staying power or strong growth prospects in a rapidly changing economy. They also pay, on average, higher than average wages, so that their growth will contribute to increasing Iowa’s overall average wage. Finally, these clusters were selected because Iowa has a competitive advantage in the form of such things as existing industry concentrations or research institutions upon which the industries rely, which makes the state especially attractive.

In the past several years, a number of state agencies have focused their efforts toward the goal of increasing earnings by growing industries in these targeted clusters on both the supply and demand sides of the labor market equation.

B. Leveraging Resources Among State Agencies

The Governor’s method for managing state government provides a comprehensive framework for coordinating all of Iowa’s resources around several key strategic goals, including those that ensure a skilled workforce:

1. Governor Vilsack and Lt. Governor Pederson have used their Leadership Agenda to align the resources and activities of all state departments to achieve common goals.

Recognizing the close correlation between high levels of education and skill with high earnings, items in their Leadership Agenda set specific goals for increasing the level of Iowans' education and skill attainment and increasing the number of jobs that require post-secondary education and training. These are, of course, consistent with the goal of growing the advanced manufacturing, life sciences, and information solutions targeted industry clusters which forms the core of Iowa's economic development strategy.

2. The Governor has also organized all state departments into five Enterprise Management Teams charged with coordinating their activities and cooperating to develop innovative strategies for meeting the goals of the Leadership agenda.
3. These processes are further supported by a number of good management practices, codified by Iowa's Accountable Government Act, by which all state departments must produce a number of documents and make them available to the Governor and others in the executive branch, the legislature, and the general public via the state's *Results Iowa* Internet site:
 - ◆ An agency strategic plan, updated annually,
 - ◆ A corresponding performance plan with measurable goals for key strategies,
 - ◆ A performance report that details annual progress toward goals in the performance plan.
4. The Governor also periodically focuses attention on specific major policy issues by convening ad hoc planning and policy advisory councils composed of public and private officials to make recommendations for further action. The very first such group he convened was Iowa's 21st Century Workforce Council. Others have included a comprehensive, bipartisan, multi-sector strategic planning effort that set long-term goals for Iowa. Most recently, he has convened the Iowa Learns Council to make recommendations concerning education and the transition from education to the workplace, and a group to examine issues involving older workers.

C. Ensuring Education/Training to Support a Skilled Workforce

The framework described above provides ample occasions for state agencies as well as private sector officials to communicate about the skills needed by the workforce and to coordinate efforts to assure that these skills are provided. Cabinet agencies coordinate on an ongoing basis around specific issues, too. For example, when a new state program was proposed for community colleges to help meet the skill needs of businesses in targeted industry clusters a few years ago, representatives of the workforce development, education, and economic development agencies met with community college representatives to help design legislation that would assure that the resources were focused on training in priority industries and that the resources were deployed promptly.

Occupational and industry projections are routines used by state and regional officials to anticipate education and training needs. This information is supplemented by ongoing personal contacts between business people and a range of officials of the overall workforce development system,

including One-Stop and community college staff. This combination of statistical analysis and personal consultation provides a thorough means of keeping the workforce development system in touch with businesses' needs.

It is important to note that the continuum of opportunities does not end after workers become employed. Iowa has for many years had a state-funded program for training incumbent workers in high skill, high wage, and targeted industries.

D. Collaboration Efforts to Develop Innovative Strategies

It is abundantly clear that the education and training of Iowa's human resources is critical to our economic growth and standard of living. As described above, there is a formal process through the Enterprise Management Teams for state departments to communicate and coordinate their activities. These teams are supplemented by the ad hoc councils periodically convened to update Iowa's strategies for addressing these public policy challenges.

One recent example involved the Iowa Learns Council. One of the Council's three committees examined the transition from school to work at both the secondary and post-secondary levels. The state workforce development, education, and economic development agencies all provided staff support to this committee as it developed its recommendations, and are now all engaged in the implementation phase.

Each of the individual agencies' work also keeps them in touch with sub-state partners, such as Iowa's strong network of community colleges, and with members of the private sector as well. The departments of workforce development, education, and economic development all have representation from the private sector on their governing boards, as well as a variety of other business groups to advise and assist them. The combination of these mechanisms assures that the workforce development system stays in close touch with both its partners and its customers.

E. Youth Opportunities

The Governor, who had himself been in foster care as a youth, takes a particular interest in serving youth at risk and helping them to prepare for the workplace. In one recent example, he asked several state and local organizations to devise a more comprehensive clearinghouse of work-based learning opportunities (practica, internships, job shadowing, etc.) and related outreach because he understands that this kind of experiential learning is a key to preparing all segments of the youth population for work.

Iowa's Governor has recently declared Iowa a State of Promise. The Governor stated, "As citizens of this great state we take seriously our responsibility to our children. We make sure that every child has the best opportunity to succeed in life by making a commitment to their education, ensuring their health and well being, and providing endless opportunities for their future endeavors. We are launching this statewide initiative to better collaborate and offer direct support to our young people."

Governor Vilsak also brought Iowa's Jobs for America's Graduates (IJAG) to Iowa. IJAG is a dropout prevention program run by a non-profit and continues to be funded with IWD state

discretionary funds. The Governor's most comprehensive initiative for serving all youth, and specifically at-risk youth, is the Youth Collaborative.

The Iowa Collaboration for Youth Development (ICYD), created in 1999 by representatives from 12 state agencies along with several local agencies and private organization, is a continually evolving dynamic partnership between state and local entities concerned about all youth and youth policies. The interagency initiative is designed to better align state policies and programs and encourage collaboration among multiple state and community agencies on youth-related issues. ICYD aims to promote the use of positive youth development practices in communities throughout Iowa.

The five promises of America's Promise and of Iowa's Promise are closely aligned with the ICYD results or outcomes desired for all youth in Iowa. In Iowa, the Governor embraces the work of the ICYD in his vision that all youth receive the services and opportunities to become successful and productive adults. This includes services and opportunities for all youth to develop and achieve career goals through education and workforce training. Youth that have barriers to success, such as youth that are out of school, homeless, in foster care, aging out of foster care, offenders, children of incarcerated parents, migrant and seasonal farm worker youth, and other risk factors are included in this vision.

Iowa Workforce Development has been a key player in collaborating with many partners of the ICYD. The collaborative efforts include working with the Iowa Department of Human Services (DHS) in the foster care system to help develop and implement the Iowa's plan for providing services to youth aging out of foster care. IWD has also been involved developing and implementing the Employment and Training Voucher program that provides foster care youth wishing to further their education beyond high school with scholarship and support funding. Iowa's vocational rehabilitation agency worked with IWD to secure a transition grant from the Department of Labor for transitioning youth with disabilities into training/education beyond high school.

Staff from IWD has also been a key player in a redesign of an Iowa Department of Education initiative for students in the K-12 system. This initiative is community-based and its foundation is the resulting framework of the ICYD, which was designed so that all youth in Iowa have the benefit of safe and supportive families, schools and communities, are healthy and socially competent, are successful in school, and are prepared for a productive adulthood.

The ICYD has recently begun work with the Iowa Department of Public Health on a violence prevention grant that will strive to decrease violence among our youth. IWD staff will also work with this initiative.

All of the above initiatives are supportive of the Governor of Iowa's vision for all youth. By basing policies, programs, services, and opportunities for youth of all ages and on the tenets of positive youth development, Iowa strives to reduce the number of youth that fall into at-risk categories and enhance the success of our youth.

II. STATE WORKFORCE INVESTMENT PRIORITIES

As noted earlier, the Governor and Lt. Governor's Leadership Agenda places particular emphasis on high levels of education and skill attainment and on the growth of jobs that demand post-secondary preparation, including jobs in the three broad targeted industry clusters (advanced manufacturing, life sciences and information solutions). The workforce development system's priorities are specifically designed to align with the Governor's vision in these areas. They include:

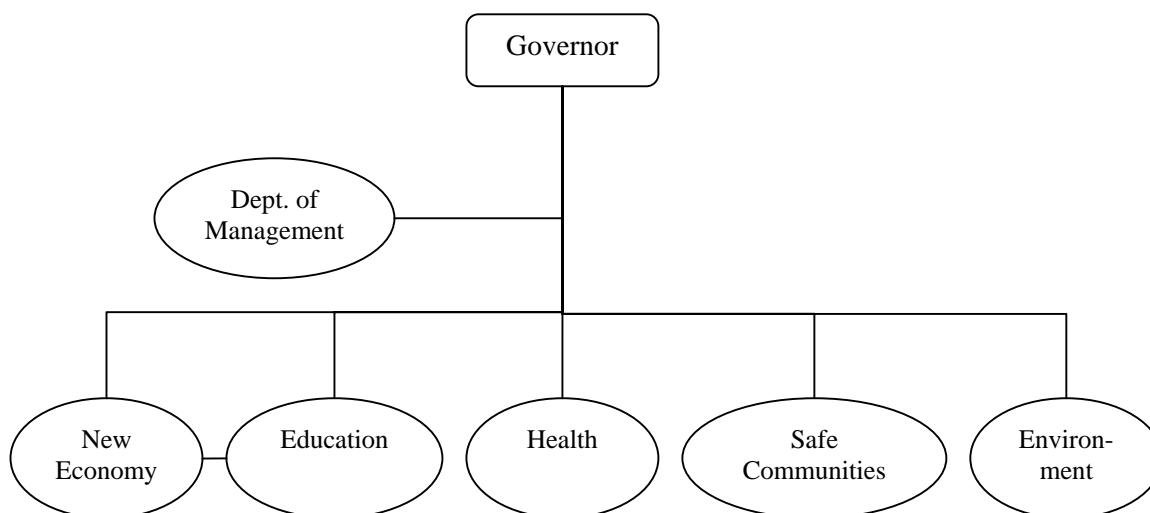
- ◆ Increase the size of the skilled workforce;
- ◆ Increase Iowans' earned income; and
- ◆ Grow the targeted industries and needed workforce skills.

Operationalizing these priorities includes fully utilizing all members of the workforce, including those who are at a disadvantage in the labor market, and providing opportunities for skill development. In many of Iowa's publicly funded programs, resources are specifically aimed at training for skills needed by the targeted industries. Organizations in Iowa's workforce development system strive to create paths of opportunity that permit individuals to increase their skills and earnings and thereby meet the skill needs of the industries that drive the state's economy.

III. STATE GOVERNANCE STRUCTURE

A. The Governor's Employment and Training System

The Governor has organized all state agencies into five Enterprise Management Teams that are charged with jointly planning strategies and coordinating activities that align with the Governor and Lt. Governor's Leadership Agenda. By state law, each agency is also responsible for developing strategic plans, with accompanying performance plans and reports that support the Leadership Agenda. Iowa's Department of Management assists the Governor and the state agencies with these activities. The following chart shows how this arrangement is organized.



Iowa Workforce Development, the agency responsible by state law for the lead role in Iowa's workforce development system, is a member of the New Economy Enterprise Management Team along with the departments of Economic Development, Transportation, Natural Resources, Commerce, Cultural Affairs, Civil Rights, the Iowa Utilities Board, Iowa Finance Authority, the Lottery, and the Iowa Public Employees Retirement System. While agencies in different Enterprise Management Teams often cross teams to coordinate specific activities, this occurs particularly frequently between the New Economy and Education teams for workforce development issues.

B. State Workforce Investment Board

1. Board Organization/Structure: The Iowa Workforce Development Board was created in 1996 through state legislation and was grandfathered in as the State Workforce Investment Board under WIA. There are 17 Board members: nine are voting members appointed by the Governor and share his vision for Iowa's workforce; and eight are non-voting ex-officio members who are appointed by their constituent body. The Board has a chair, a vice-chair, and several committees that meet to provide oversight to Iowa employment and training programs. The State Workforce Board, by state legislation, is also the Board of Directors for Iowa Workforce Development. A list of the current State Workforce Board members is included as Attachment 1.

2. **Board Organizational Representation:** The Board membership contains equal representation of business and labor plus one representative for community-based organizations. The current community-based organization is a community action agency that serves many constituents, including those on welfare, youth, immigrants, non-English speakers, homeless, etc. The State Board chair also serves on the Iowa Jobs for America's Graduates (I-JAG) board of directors, which serves in-school youth. Non-voting members represent Board of Regent institutions, community colleges, Iowa private colleges and universities, AFSCME and the state legislature.

The State Workforce Board in Iowa is not constituted in accordance with the Workforce Investment Act. Because the Workforce Development Board already existed under state legislation, the WIA statute permitted it to be grandfathered as the State Board. The following narrative and chart provide information on the Iowa Board and how it represents the constituencies required under the Act.

WIA Legislation		Iowa Alternative Entity
1.	Governor	Appoints all voting board members
2.	State Representatives	Represented as ex-officio members
3.	State Senators	Represented as ex-officio members
4.	Business	Represented by 4 members
5.	Labor	Represented by 4 members
6.	Chief Elected Officials	Represented by direct communication to the board and at board functions.
7.	Organizations with experience serving Youth.	Represented by board member constituencies and provided opportunities for direct input to the board.
8.	Community-based organizations, community colleges	Represented by 1 member and 3 ex-officios representing post-secondary education
9.	Lead State Agency Officials	Represented by direct communication with the board and at state-level work groups.

2. **Identifying Board Members:** The Governor has been appointing voting members to the Board since its inception in 1996. The Governor confers with business-related associations/organizations and labor organizations when making his appointment selections. State of Iowa law requires that all Governor-appointed boards and commissions be gender-balanced, politically balanced and geographically balanced. The Iowa Workforce Development Board meets all of these requirements.
3. **Board Membership Balance:** The board, because of its balance, represents both urban and rural areas of the state and the views of many diverse groups. Many members of the state board serve in other capacities, for example: • one board member is also chair of a local Workforce Investment Board; • another is a member of a local board; • yet another board member is a former local workforce investment chair. One

member of the board is an economic developer who provides a link a between economic development and workforce development. There are also members of the Board who are union officers to help link workforce development to organized labor and their related programs. Business representatives on the board are members of other organizations that support workforce development initiatives, including the Iowa Bankers Association. The three board members who represent education at the post-secondary level assist in connecting educational activities to workforce development initiatives. All of these represented sectors help to make the board have a balanced and diverse approach to workforce development.

4. Board Functions: The board meets a minimum of five times a year to review the operation of WIA programs, to provide recommendations on changes to the WIA system, and to meet with stakeholders and service providers.

State legislators require that the board develop and coordinate the implementation of five-year and twenty-year comprehensive workforce development plans for the state. The board has also developed methods of evaluation for the goals and objectives set by the Governor. Finally, the board also established guidelines and procedures for the awarding of grants for services by Iowa Workforce Development.

5. Public Access: Iowa ensures that the public (including people with disabilities) has access to board meetings and activities by posting all of the board's agendas on the Iowa Workforce Development website at least seven days prior to each meeting/activity. State of Iowa law requires both local and state board meetings to be in compliance with the state's open meeting laws. A notice for each State Workforce Development Board meeting is sent to the Des Moines Register for statewide distribution. Included on the agency's web site are postings of State Board minutes, a list of meeting dates, and names of the current board members and staff contact names and telephone numbers. All board meetings are held in fully accessible facilities and are open to the public. An e-mail containing the board's meeting agenda and a draft of the minutes to be acted upon at each meeting is sent to over 100 interested individuals before each meeting.
6. Conflict of Interest: The state legislation that created the Iowa Workforce Development Board states that if a member of the workforce board has an interest, either direct or indirect, in a contract to which the department or workforce development is or is to be a party, the interest shall be disclosed to the workforce development board in writing and shall be set forth in the minutes of a meeting of the Workforce Development Board. The member having the interest shall not participate in action by the Workforce Development Board with respect to the contract. Local board members are also directed to excuse themselves from any discussion or voting in which they have a vested interest. The minutes from local board meetings will indicate when a board member abstains from voting and the nature of the discussion item.

Iowa's regional delivery system includes a variety of organizations, institutions, and commercial enterprises. Many of the same organizations and individuals who are responsible for the design and management of the Regional Workforce Development System also are in the business of delivering workforce development products and services. The potential for conflict of interest is inherent in this type of structure. Consequently, certain compensating controls are applied to the decision-making process to reduce and avoid conflict of interest in all transactions involving workforce development funds.

7. Resources Provided: The Board receives a state appropriation to support its activities and staff for the board are provided through WIA funding. Because the State Workforce Board also acts as the Board of Directors for Iowa Workforce Development, all IWD employees can be called upon to assist the board. Numerous individuals are called upon to give presentations to the board who are not funded by WIA, and are frequently from other state agencies, organizations, businesses, unions, non-profits, etc.

C. Structure/Process for State Agencies Communication/Collaboration

The State Board provides multiple opportunities for communication and collaboration with its constituencies. Primary among these constituencies are the Regional Workforce Investment Boards (RWIBs). These RWIBs are notified of State Board meetings, and representatives from local workforce boards often present information at State Board meetings. The State Board has visited One-Stop Centers and met with local service providers and clients, and plans to continue to conduct on-site visits. State Board members have also attended local workforce investment board meetings to provide input on the activities of the State Board and to allow for an exchange of information between the two levels of operation.

1. Operational Collaborations: At the state level, the board often invites representatives of state agencies to present at State Board meetings, including the Departments of Elder Affairs, Economic Development, Education, Juvenile Justice, Human Services and Natural Resources. In addition, collaborative training sessions and information exchange are provided with partner agencies. For example, in June 2005, the Iowa Workforce Development Board will meet with the Iowa Department of Economic Development Board to discuss issues of mutual interest. In April 2005, a one-day training session on partnerships among economic development and workforce development was conducted. Members of the state's Economic Development Board were invited to participate in the training session. Discussion, meetings, and training sessions such as these go far to establish collaboration between state agencies.

Additional projects that are planned to promote joint-agency communication and participation include: • a project to support mature workers in April; • sponsorship of a statewide Employer Benefits Survey in 2005; and • establishing a certification process for one-stop centers.

2. Agency Sharing/Communication: Governor Vilsack has organized all state agencies into five Enterprise management teams to share information, coordinate activities and ensure that their efforts are aligned with the Governor's key priorities. Iowa Workforce Development, as the lead agency for workforce development in Iowa, is a member of the New Economy Enterprise Management Team, which deals with economic development and infrastructure issues along with workforce development. This team is composed of cabinet-level officials, selected staff and other state agencies, including Economic Development, Commerce, Transportation, Iowa Finance Authority, Cultural Affairs, Civil Rights, Iowa Public Employees retirement System, the Lottery, and the Iowa Utilities Board. They meet at least monthly to assure that effective communications exist. As noted previously, state legislation calls for Iowa State Workforce Investment Board to also serve in the capacity of Iowa Workforce Development's Board of Directors, so the board's concerns are represented at these cabinet-level meetings.

At each State Workforce Development Board meeting, the Director of Iowa Workforce Development, addresses the group and updates them on the work on the New Economy Enterprise Team. The board is frequently asked to give recommendations to the New Economy Team on their work. Also, the board has had presentations from many of the New Economy Team members at their business meetings, including Iowa Department of Economic Development and Cultural Affairs

Governor Vilsack has established supplementary channels of communications among state agencies as well to deal with specific issues. The departments of Economic Development, Education, Human Services, Elder Affairs, Human Rights, and others frequently collaborate on such topics as school improvement initiatives, support of regional economic development efforts, school-to-career activities, welfare services, immigration, older workers, customized training for targeted industry clusters, and issues that cross agency lines.

3. Communication Mechanisms: A variety of communication tools are used by the State Board, including the field memo series used by Iowa Workforce Development to distribute information to the local workforce offices in a formal manner. Also, news releases are distributed statewide. A website that includes information on all sixteen Iowa WIA regions is maintained by Iowa Workforce Development and public notices are published in local and statewide papers announcing meetings and grant opportunities. IWD also hosts a comprehensive calendar that includes information on both local and state meetings and events. The State Board's website contains the minutes from all board meetings as well as the board's future plans for meetings and on-site visits. IWD also hosts a comprehensive calendar that includes information on both local and state meetings and events.
4. Cross-Cutting Organizations: The Iowa Collaboration for Youth Development (ICYD) is a state-led interagency initiative designed to better align policies and programs and to encourage collaboration among multiple state and community agencies on youth-related issues. The goals of the initiative are to promote the use of positive youth development principles in state policies and programs and to facilitate the use of effective youth development practices in communities throughout Iowa.

The state agencies currently collaborating in support of Iowa's vision for all youth are:

- ◆ Iowa Department of Education
 - Division of Early Childhood, Elementary and Secondary Education
 - Bureau of Children, Family and Community Services
- ◆ Iowa Department of Human Rights
 - Division of Criminal and Juvenile Justice Planning
 - Division of Latino Affairs
 - Iowa Commission on the Status of Women
 - Gender-Specific Services Task Force
 - Persons with Disabilities
- ◆ Iowa Department of Human Services
 - Division of Adult, Children and Family Services
 - Division of Mental Health and Developmental Disabilities
- ◆ Iowa Department of Public Health
 - Division of Health Promotion, Prevention and Addictive Behaviors
 - Bureau of Family Health
 - Division of Tobacco Use Prevention and Control
- ◆ Iowa Workforce Development
 - Division of Workforce Center Administration
- ◆ Governor's Office of Drug Control Policy
- ◆ Iowa Attorney General's Office
- ◆ Iowa Department of Economic Development
 - Iowa Commission on Volunteer Service
- ◆ Iowa Department of Management – Community Empowerment

Meeting regularly since the organization's inception, member organizations discuss youth development issues, build consensus on a youth development framework, promote youth development principles and practices, and pursue the following three broad objectives:

- ◆ Better coordinate and align state policies and programs related to youth using a positive youth development framework;
- ◆ Identify or develop resources for use at the community level to promote youth development and to facilitate planning and implementation of effective youth-development programs; and
- ◆ Increase youth involvement in state and local level policy discussions and decision –making.

By partnering with communities and youth throughout the state, the Iowa Collaboration for Youth Development is contributing to growing Iowa's youth into successful and productive adults.

IV. ECONOMIC AND LABOR MARKET ANALYSIS

Iowa ended 2004 on more solid economic footing than the year before, as the state's businesses finally demonstrated a willingness to hire workers. During the previous three years, there had been a pervasive reluctance to expand company payrolls. Business investment, which included hiring activity, was impeded during this period by the over-accumulation of capital stock that had contributed to the recession.

Although the pace of job growth picked up during the latter part of 2004, the Midwest states were slower to move into a recovery than many other parts of the country. One of the main reasons for the slower recovery was the region's high concentration of manufacturing in its total non-farm employment. Led by manufacturing, Iowa's non-farm employment decreased from 1,475,100 in December 2000 to 1,435,000 by June 2003. Manufacturing accounted for over 75 percent of the job losses that occurred during this period.

The pace of the recovery was further challenged in 2004 by substantial increases in commodity prices. Steel mill product prices began to climb in late 2003 and continued to increase throughout 2004, ending the year close to 50 percent higher than a year earlier. In Iowa, the high price of steel was cited as a reason for some temporary layoffs and a couple of plant closings in manufacturing. As the year progressed, high oil prices placed tremendous financial pressure on manufacturers and trucking firms. Oil prices, which ended 2003 at just over \$32.00 per barrel, had jumped to over \$53.00 per barrel by October 2004. Metal is another commodity with price increases in early 2004, remaining high throughout the year. Metals are used extensively in both the construction and manufacturing industries. In nondurable goods manufacturing, the high price of cattle squeezed profit margins in the meatpacking industry. This was a major factor in the closing of the Iowa Quality Beef Supply Company in Tama during the summer of 2004.

Even though Iowa's employment conditions had improved in 2004, the state's unemployment rate rose to 4.8 percent from 4.4 percent in 2003. The fact that companies were hiring again attracted a larger number of job seekers into the labor force. The state's pool of unemployed workers increased to 78,000 in 2004 from 72,000 in 2003.

A. Iowa's Economic Base by Industry

Iowa's non-farm employment increased to 1,456,100 in 2004. This marked the first time since 2000 that payroll employment reflected an increase from the previous year. During 2004, the state remained in recovery mode as it tried to recapture some of the jobs that were lost during the 2001 recession.

A ranking of the state's major industry groups shows that trade and transportation is Iowa's largest industry, accounting for 21 percent of non-farm employment. This industry encompasses wholesale and retail trade, utilities and transportation. For 2004, transportation turned in a strong performance by adding 1,500 workers over the year. The transportation and trade sector, as a whole, incurred large losses since 2001 as many small retail stores were forced out of business during the recession. Government represents the second-largest sector in non-farm employment. Roughly two-thirds of the state's government workers are employed in local government. Finally, manufacturing ranks as

the state's third largest industry with an average employment of 222,900 in 2004. The industry peaked at 251,400 workers in 2000.

The following table provides the current composition of the state's non-farm employment and the percent change in each industry's employment level from the previous year:

	Employment 2004	Percent of Total	Percent Change in Employment from 2003
Mining and Natural Resources	2,100	0.1	10.5
Construction	68,400	4.7	5.1
Manufacturing	222,900	15.3	1.3
Trade and Transportation	305,600	21.0	0.8
Information	33,500	2.3	-0.3
Financial Activities	96,700	6.6	1.6
Professional and Business Services	107,200	7.4	1.5
Education and Health Services	191,400	13.1	0.9
Leisure and Hospitality	127,600	8.8	1.8
Other Services	56,300	3.9	0.2
Government	244,300	16.8	-0.2
Total Non-farm Employment	1,456,100	100.0	1.1

Source: Employment and Statistics Bureau, Iowa Workforce Development.

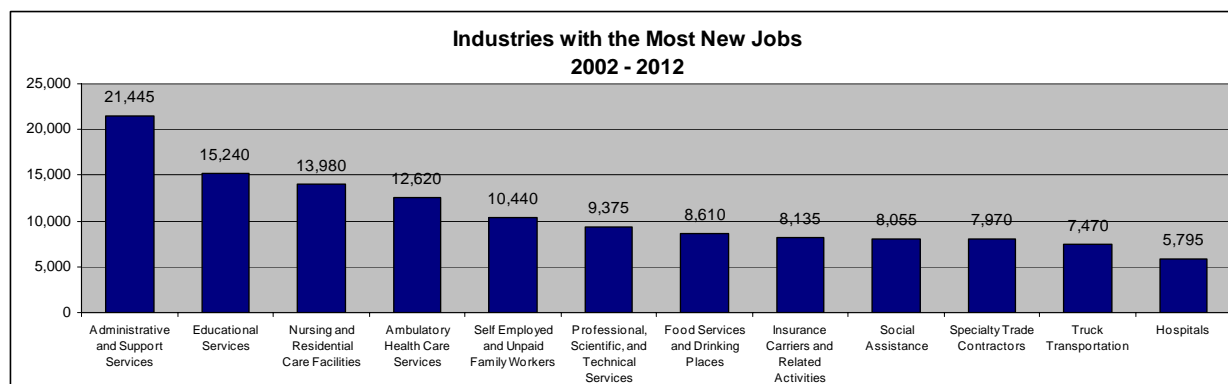
B. Growth Projection

On the short-term, industries expected to grow in employment through 2005 will be educational services, specialty trade contractors, and food service and drinking establishments. Industries expected to decline in employment through 2005 will be computer and electronic products and electrical equipment, appliance and component manufacturing.¹ The construction trade industry has grown significantly over the last couple of years, generating a need for persons skilled in the construction trades.

The long-term industry outlook for the 2002 to 2012 period shows that administrative support and health and educational services industries will account for over half (56.3%) of the new jobs that will become available. The 12 industries shown in the following table will create 129,135 of the 212,895 new jobs Iowa's economy is expected to generate over the period. Industries expected to decline over the decade are utilities, computer and electronic product, postal service, and electrical equipment, appliance and component manufacturing.²

¹ Statewide Short-Term Industry Projections (4th quarter 2003 to 4th quarter 2005), Iowa Workforce Development

² Statewide Long-Term Industry Projections (2002 – 2012), Iowa Workforce Development



Because Iowa is still recovering from the 2001 recession, the state has lost a relatively large number of jobs in the manufacturing industry. Beginning in 2004, the state started to recapture some of the manufacturing jobs that were lost. Overall, manufacturing was up 2,900 jobs in 2004. The gains were concentrated in durable goods manufacturing, the segment of the industry that had incurred the largest job losses because of the recession. Also, the state lost a large number of telecommunications jobs within the information industry. Most of these job losses were because of excess capacity in the industry, and the industry restructuring that occurred. The table below shows the long-term occupational losses over the next decade.

IOWA STATEWIDE OCCUPATIONAL PROJECTIONS: 2000-2010			
DECLINING OCCUPATIONS			
	Estimated	Projected	Annual
	Employment	Employment	Growth
Occupation Title	2000	2010	Rate (%)
Railroad Brake, Signal, & Switch Operators	420	190	-5.5
Telephone Operators	815	600	-2.6
Switchboard Operators, Including Answering Service	1,990	1,490	-2.5
Order Clerks	3,320	2,580	-2.2
Meter Readers, Utilities	760	590	-2.2
Word Processors & Typists	2,530	1,975	-2.2
Eligibility Interviewers, Government Programs	1,070	835	-2.2
Computer Operators	2,805	2,240	-2.0
Insurance Claims & Policy Processing Clerks	2,435	2,000	-1.8
Prepress Technicians & Workers	1,245	1,050	-1.6
Electronic Home Entertainment Equipment Installers & Repairers	425	365	-1.4
Dishwashers	5,275	4,535	-1.4
Photographic Process Workers	330	285	-1.4
Proofreaders & Copy Markers	295	255	-1.4
Office Machine Operators, Except Computer	1,370	1,185	-1.4
Tool Grinders, Filers, & Sharpeners	455	395	-1.3
Judges, Magistrate Judges, & Magistrates	345	300	-1.3
Electrical & Electronic Equipment Assemblers	2,610	2,280	-1.3
Graders & Sorters, Agricultural Products	1,555	1,360	-1.2
Numerical Tool & Process Control Programmers	795	700	-1.2
Announcers	1,400	1,235	-1.2
Procurement Clerks	660	585	-1.1
Farmworkers, Farm & Ranch Animals	3,745	3,325	-1.1
Cleaning, Washing, & Metal Pickling Equipment Operators & Tenders	360	320	-1.1
Dining Room & Cafeteria Attendants & Bartender Helpers	2,325	2,090	-1.0

C. Industries in Demand of Workers

The majority of the fastest-growing occupations can be found in two major occupational groups: computer and healthcare. In Iowa, 32 percent of the occupations are computer-related and 28 percent are healthcare-related. The remaining eight growth occupations can be found in the areas of office and administrative support, community and social services, personal care and services, transportation and material moving, sales, construction and extraction, installation, maintenance and repair, and production. Iowa has three occupations that are among both the fast growing and the largest job growth. They are computer software engineers; applications; computer support specialists; and customer service representatives.

The demand for computer-related occupations will exist as long as the business service industry, in particular information technology and the computer and data processing services, continues its vigorous growth and as businesses require more sophisticated and complex technology. In addition, the surge in electronic commerce has created a need for new and more complicated applications, including computer security systems for the Internet and intranets. As more business is conducted via computers, businesses become more vulnerable to viruses and hackers and will require experts in the field to prevent such occurrences. The September 11 terrorist attack has drawn attention to the need for business to focus efforts and resources on computer security and computer disaster recovery. Businesses are progressively collecting more data and require a reliable computer system team that can manage large databases of key information, provide upgrades and customization to include the latest technology, resolve problems and provide technical support.

As our population ages, Iowans will require more health care services and will also experience the development of medical advancements that provide treatment for chronic ailments. This will result in increased demand for healthcare workers. Job opportunities are anticipated for technicians as they will be expected to provide services performed in the past by highly paid workers such as dentists, pharmacists, physicians and therapists.

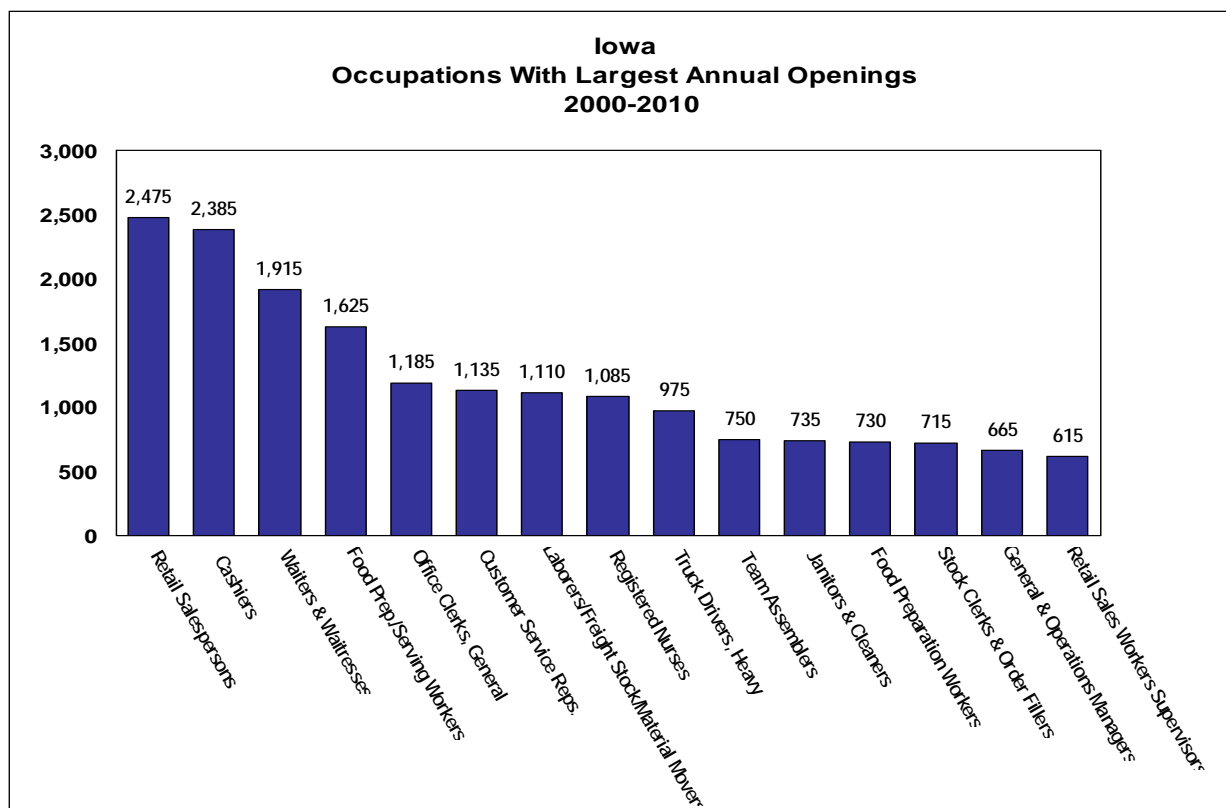
Fast-growing occupations often require postsecondary education or above and can be found in occupations that require higher level skills such as critical thinking and time management. For Iowa and the nation, over 65 percent of the fastest-growing occupations fall into this category.

Between 2000 and 2010, Iowa's economy is expected to generate 58,500 job openings annually. Thirty-three percent of the openings will be new jobs, which represent an 11 percent growth rate as compared to a 15 percent growth rate nationally. Thirteen percent of Iowa's new jobs will be in sales and related occupations.

A larger percentage of job openings will occur to replace workers who leave existing jobs because of retirement, death or similar reasons that cause workers to leave the labor force on a more permanent basis. Fifteen occupations will comprise 31 percent of the total job openings annually for Iowa. One-fourth of the occupations are concentrated in the office and administrative support and sales; the remaining are spread across most major occupational groups.

The following tables illustrate the occupations projected to have the highest growth rates and those with the highest number of annual openings over the ten-year period between 2000 and 2010.

IOWA: 2000-2010			
FASTEST GROWING OCCUPATIONS			
	Estimated	Projected	Annual
	Employment	Employment	Growth
Occupation Title	2000	2010	Rate (%)
Computer Software Engineers, Applications	2,505	4,550	8.2
Computer Support Specialists	4,555	8,255	8.1
Network Systems & Data Communications Analysts	935	1,640	7.5
Network & Computer Systems Administrators	1,670	2,890	7.3
Computer Software Engineers, Systems Software	2,285	3,595	5.7
Database Administrators	705	1,075	5.2
Desktop Publishers	470	695	4.8
Physician Assistants	730	1,070	4.7
Personal & Home Care Aides	3,965	5,815	4.7
Computer Systems Analysts	3,045	4,390	4.4
Computer & Information Systems Managers	3,015	4,325	4.4
Aircraft Cargo Handling Supervisors	130	185	4.2
Medical Records & Health Information Technicians	1,930	2,745	4.2
Gaming Change Persons & Booth Cashiers	510	725	4.2
Massage Therapists	720	1,020	4.2
Marriage & Family Therapists	665	940	4.1
Sheet Metal Workers	2,055	2,895	4.1
Woodworking Machine Setters, Operators, & Tenders, Except Sawing	1,095	1,545	4.1
Medical Assistants	3,165	4,420	4.0
Sawing Machine Setters, Operators, & Tenders, Wood	845	1,180	4.0
Pharmacy Technicians	2,215	3,085	4.0
Physical Therapist Assistants	570	795	3.9
Recreational Vehicle Service Technicians	115	160	3.9
Gaming Dealers	1,415	1,960	3.9



Although the state data on applicant and openings are a small picture of available jobs and those seeking employment, the Iowa Workforce Development Center records confirm the findings of the long-term occupational projections.

D. Critical Jobs/Occupations

Iowa is focusing its economic development growth efforts on those occupations that pay an average of at least \$35,000 annually. These jobs are necessary to retain Iowa's college graduates. The economic development focus is on increasing employment and wages in three industry clusters:

- advanced manufacturing; • information solutions; and • life science.

E. Required Skills for Jobs

Bearing in mind the state's focus to create and maintain jobs with an average annual wage of at least \$35,000, retain our college graduates, and provide opportunities for employment, the identification of skills has been geared towards those occupations that are high-growth/high-demand. Such occupations demand higher skill levels. Iowa's education system produces graduates with high levels of basic and advanced skills, but many of those graduates leave the state, which can create cyclical cause and effect relationship in which there may not be a sufficient number of skilled workers to attract high-paying occupations, and there may not be sufficient numbers of such occupations to retain the skilled workers.

In addition to occupationally specific, or hard skills, the state recognizes the need for workers to have the "soft skills" necessary to be successful in the workplace. Such skills include learning, active listening, critical thinking, decision-making, problem solving, and workplace social skills. Some programs in the One-Stop system, such as the PROMISE JOBS welfare reform program, have developed classes in Life Skills or similar soft skill workshops to address these needs.

F. Labor Pool Demographics

Labor force projections for the state from 2005 to 2020 were developed by applying labor force participation rates for each age cohort from the Current Population Survey to population projections prepared by Woods and Poole Econometrics.

**Iowa Labor Force Projections
2005 – 2020**

	2005	2010	2015	2020
Age 15 to 19	125,410	121,210	113,370	118,340
Age 20 to 24	181,320	169,230	164,800	154,910
Age 25 to 34	334,040	360,930	354,760	338,540
Age 35 to 44	364,540	335,560	352,740	381,120
Age 45 to 54	384,920	388,110	357,010	330,680
Age 55 to 64	214,460	359,610	287,720	290,890
Total	1,604,690	1,634,650	1,630,400	1,614,480

The labor force over the 2005 to 2020 period will undergo a dramatic transformation brought on by the mass retirement of baby boomers and an influx of new immigrants and younger, college-educated workers to fill the void. The baby boom generation (born 1946-1964) represents the largest percentage of the labor force. Many of the older baby boomers have started to retire. The upcoming surge in baby boom retirements has many employers and government planners concerned that a widespread labor shortage will occur during the 2015 to 2025 period. These concerns are intensified by the fact that the age cohort just behind the baby boom generation, those roughly 20 to 35, is significantly smaller.

G. Impact of In/Out Migration

Numerous studies of Iowa's workforce needs have indicated that there will be a critical shortage of workers to meet the demands of business early in the 21st Century. Data from the U.S. Bureau of the Census predicts minimal population growth based on in-migration estimates. That factor, coupled with slow in-state population growth and an aging workforce, will contribute to the projected workforce shortage. The state has invested in several strategies to impact this situation, including outreach and services to under-represented populations in the workforce, establishing transition assistance to new-Iowans, and recruiting workers with skills in demand to return to the state or consider Iowa's career opportunities.

H. Skill Gaps

Demand for skilled workers in Iowa's economy is outpacing their supply throughout the state. Increasingly, today's jobs – including those at the entry-level – require far more technical and basic skills than similar positions did just decades ago. Several examples are:

- ◆ Many retail businesses now use business practices to have people apply for jobs. Applicants are asked to sit down at a computer and complete an application on site. To do that requires some basic keyboarding skills not needed in the past.
- ◆ With increasing diversity in Iowa and the explosive growth in our Hispanic population, more and more occupations that deal with the public or who supervise others are looking for bi-lingual people to fill the openings.
- ◆ In the past an individual with no skills could be hired and trained quickly to do a repetitive task on an assembly line. Today people looking for manufacturing jobs often work in small teams with robots and computerized machines. The application process is much more involved often requiring math, reading and teamwork pre-testing, and the skills required are at a much higher level.

Fast-growing occupations usually require postsecondary education or above and can be found in occupations that require a higher level of skills such as critical thinking and time management. For Iowa and the nation, over 65 percent of the fastest-growing occupations fall into this category.

A report by ACT Inc. stated that fewer than one in four high school graduates have taken the coursework necessary to succeed in college or in the workplace. While needed skill levels are increasing in math, English and science, a growing number of students are not taking the rigorous college prep courses.

Further studies ranging from the “Skills 2000 Commission Report” to the “Skills 2006” study have shown that businesses expect their future training needs to increase. In the “Skills 2006” study, for example, 86 percent of the businesses surveyed expect their training needs to increase. The top priorities included skills in: • problem solving; • team work; • conflict management; • customer service; • negotiation; • time management; • communication skills - including verbal/non-verbal communications; • e-mail communications; • written communications; • phone communications; • work etiquette as it relates to communication; • grammar/speech and listening; and • computer skills, which included keyboarding, word processing, spreadsheets and software applications.

I. Workforce Development Issues

An Aging Workforce: Based on the 2000 Census, Iowa’s population has grown older and more diverse. The median age of all Iowans had reached 36.6, which was the 10th highest median age in the nation. Thirty-eight Iowa counties had a median age of at least 40. In addition, Iowa ranked 4th in the proportion of population 65 and over, and 2nd in the proportion of population 85 and older.

The Local Employment Dynamics (LED) program sponsored by the Census Bureau completed a ‘Profile of Older Workers in Iowa’. A large wave of workers born during the Baby Boom from 1946 to 1964 will be leaving the workforce over the next few decades. The aging workers led an increase in the proportion of the workforce 45 years and older from 1999 to 2002 in Iowa. Iowa planners anticipate the proportion will grow even more rapidly over the next two decades unless a large influx of younger workers comes into Iowa. In 1999, about 69 percent of Iowa workers were 14 to 44 years old. By 2002, that figure dropped to about 65 percent of workers. Nineteen percent of Iowa workers were 45 to 54 years old in 1999 and 21 percent were in that age group in 2002. Iowa needs to focus on industries and regions of the state that are likely to be most affected by the changes in the size and composition of the labor force in coming decades.

Healthcare Workers: Currently, the state is experiencing a shortage of health care workers, specifically nurses. As the age of the population increases, this shortage will continue to be prevalent in the state. As a result, IWD has increased its involvement with health care providers, administrators and governmental agencies to address the issue. A state office has been established within the Iowa Department of Public Health to address the shortages of health care providers, and financial incentives have been established in nursing programs and education institutions to encourage individuals to pursue the nursing field.

Diversity: The dramatic change in the composition of the Iowa population during the 1990’s was the migration of Hispanics into the state. Hispanics accounted for more than a third of the state’s population growth during the decade and accounted for a 152 percent increase in the Hispanic population. One of the challenges facing the state has been assimilating this ethnic group into the state’s workforce. As a way to address this workforce need, Iowa Workforce Development established New Iowan Centers to offer workforce development services to persons who have recently moved to Iowa and are seeking employment. The centers are designed to support workers, businesses, and communities with information, community service referrals, job placement, translations, language training, and resettlement assistance, as well as technical and legal assistance concerning forms and documentation.

Average Wage: The number of low paying jobs that continue to saturate the workforce is another issue for the state. Occupations currently with high employment and that pay under \$9.00/hour include those in: • sales and related occupations; • food preparation and serving-related occupations; • office and administrative support occupations; • building and grounds cleaning and maintenance occupations; • transportation and material moving occupations; and • production occupations.

For calendar year 2003, Iowa ranked 36th in the country for average weekly wage. Although Iowa is second in the nation in personal income growth for 2004 with an increase of 7.8% over the previous year, it is still ranked 31st in the country with an average wage of \$30,560. Also, 2003 micro data from the Current Population Survey showed that Iowa ranked 14th among the states based on the percent of employed workers engaged in multiple jobholding (7.5%). A high rate of multiple job holding can suggest that workers need to work more than one job to make ends meet.

“Brain Drain”: Another major consideration for Iowa is the “brain drain” or “out-migration” of our college graduates. The table below illustrates the number of alumni and their geographic location upon graduation.

**Geographic Location of Alumni
2002-2003**

	Iowa	Contiguous States	Other States & U.S. Territories	Foreign
Regents' Universities	189,288	101,173	176,635	11,728
	39.5%	21.1%	36.9%	2.4%
4-Year Independent	141,763	89,688	102,906	7,123
	41.5%	26.3%	30.2%	2.1%
Community Colleges	168,163	18,349	12,864	258
	84.2%	9.2%	6.4%	0.1%
2-Year Independent/Other	15,835	6,807	20,914	1,769
	34.9%	15.0	46.1%	3.9%
Total	515,049	216,017	313,329	20,878
	48.3%	20.3%	29.4%	2.0%

Source: Iowa College Student Aid Commission.

Note: Percentages total across to 100 percent for all alumni with known addresses.

Based on a survey of Iowa colleges and universities for the 2002-2003 school year, 48.3 percent of the state's graduates remained in Iowa. The community colleges reported the highest retention rate at 84.2 percent. The retention rate for the other institutions is much lower; however, these institutions attract higher numbers of out-of-state students. A high proportion of these students leave the state upon graduation.

In the fall of 2004, the Iowa College Student Aid Commission, the Iowa Association of Independent Colleges and Universities, and three Iowa independent colleges partnered for a study designed to explore the contributions to economic and civic sectors of the society. Survey forms were sent to tuition grant recipients who attended the three participating colleges and universities in 1990. Thirty-three percent of the universe of recipients responded to the survey by January 28, 2005. Of these respondents 69 percent lived in Iowa. The majority of those who left Iowa indicated that they moved because they were unable to find suitable employment, or because of a spouse's job, or that another state offered greater employment opportunities. Over half indicated that they would return to Iowa for an opportunity in their chosen area of interest and comparable pay.

J. Issues Critical to Economic Health/Growth

The critical issues for economic health and growth in Iowa are addressed directly from the workforce investment priorities identified previously in Section II:

- ◆ Increase the size of the skilled workforce;
- ◆ Increase Iowans' earned income; and
- ◆ Grow the targeted industries and needed workforce skills.

These priorities are based on a long-term assessment of Iowa's workforce needs. One priority issue simply involves the size of the workforce. In the 1980s, the convergence of interest rates and the value of the dollar seriously affected both agriculture and heavy equipment manufacturing, which were the pillars of the state's economy at the time. In the wake of the resulting recession, Iowa lost population over the decade. This population loss was reversed in the 1990s, but only by a narrow margin. In fact, the 2000 Census would have shown negative population growth for Iowa if it had not been for the immigration of Latino and other immigrant group members.

As a result, business people and public officials have concluded that Iowa needs to ensure that all population groups are enabled to participate in the labor market. Iowa Workforce Development has addressed this priority issue via special initiatives to assist groups such as people with disabilities and through the creation of a network of New Iowans Centers. The Governor has recently initiated a new effort to improve services to older Iowans, as well.

Beyond increasing the size of the workforce, a major priority is to increase the skills of people in the labor force. Higher-level skills provide a broader range of career options and greater earning capacity to employees. Higher skills also make them more productive contributors to their employers' bottom lines. Recognizing the strong correlation between educational achievement and earning power, the Governor and Lt. Governor have made increasing post-secondary education among members of the workforce a key item in their Leadership Agenda.

Finally, the state has prioritized skill development that is directly related to jobs in Iowa's targeted industry clusters. Economic Development funding streams, involving primarily state funds, are focused specifically on employees in these industries.

V. OVERARCHING STATE STRATEGIES

A. Leveraging WIA Title I Funds

Practitioners in the field have always argued that the employment and training resources made available from the Federal government are insufficient to meet the needs and demands of the workforce system. If we assume that the size and worth of that system is in large measure dictated by the resources available to support it, it is incumbent upon state and local partners to leverage additional funds in order to provide the best possible services to our citizens. In Iowa, the relative small size of the state and the existence of sixteen workforce investment regions combine to create a circumstance in which program and service viability are driven by the ability to access multiple funding and service sources. The result can be described both in terms of fund leverage and of service leverage.

Examples of fund leveraging at the local level range from the obvious sharing of infrastructure costs in the One-Stop workforce centers to specific projects that are supported from multiple sources. Such efforts include a project to identify and serve learning-disabled welfare recipients using a combination of federal formula funds, federal grant funds, state funds, and local contributions. Other projects supported by Iowa Workforce Development through WIA set-aside funds and local economic development funds are the “Laborshed” studies. The purpose of a Laborshed study is to measure the availability and characteristics of workers who are willing to change jobs or re-enter the workforce in local labor market areas. This data is a key factor in business expansion and site selection decisions. Business, chambers, and economic developers use this data to assist business in expansion decisions and to recruit new business to the state.

Equally important to fund leveraging is the promotion of service leveraging. This concept essentially capitalizes on the One-Stop service concept to most effectively coordinate services on behalf of the business or job seeker customer. Duplication of services is suppressed in favor of coordinated lines of business that maximize the limited resources that are available. Examples of service leveraging in Iowa include shared job development and business representatives among regional partners, and coordinated application and service processes for welfare recipients among TANF, WIA, and Wagner-Peyser agencies.

B. Strategies to Address Priorities

National priorities for the workforce system promote a business-driven, accountable, system of One-Stop Centers that are responsive to the needs of multiple customers. Specific priorities are also established for comprehensive youth development, customer choice, and an emphasis on high-growth, high-skill occupations. Such priorities mesh well with Iowa’s goals to target industries and higher skills, to increase the earnings of workers, and to grow the size of its workforce.

Multiple strategies are either already in place or planned to meet these priorities. These strategies include:

- ◆ A continued emphasis on inter-agency coordinated efforts such as the Governor’s New Economy team and the Iowa Youth Development Collaborative. Such activities promote

- resource leveraging, shared accountability, and a comprehensive focus on workforce and economic development issues;
- ◆ A variety of efforts to increase the size of the workforce, including outreach and recruitment, services to under-represented populations, and marketing of the state and its communities;
 - ◆ A renewed emphasis on training in job specific and soft skills by employment and training providers and the educational system;
 - ◆ A focus on targeted industries for economic development and skill development efforts; and
 - ◆ Continued collaboration with the business and labor constituencies through their representation on state and local boards, and through regular outreach to business and labor organizations and groups.

C. Strategies to Identify Target Industries/Occupations

In 1999, Iowa Department of Economic Development commissioned a study by the Stanford Research Institute (SRI) to re-examine targeted industries in light of Iowa's actual experience, and to update the industry sector analysis conducted by a group called Battelle Memorial Institute. This study identified key competitive advantages for Iowa (including workforce quality, training capacity, physical infrastructure, and quality of life) and identified three very broad industry clusters for future investments: • Life Science; • Advanced Manufacturing; and • Information Solutions.

The State of Iowa is in the process of identifying targeted industry clusters within regions by applying three criteria to determine the regions' competitive advantage in each of these three clusters. The first of these is wage and employment analysis. A high-wage threshold of \$35,000 and a high-employment threshold of 250 were set as measuring standards. A second tool is industry analysis which is based on industry performance. Emerging industries had at least 100 percent growth in employment and wages from 1990 to 2000. Stable industries are those industry clusters that had at least 50 percent growth but less than 100 percent growth in wages and employment from 1990 to 2000. Mature industries have less than 50 percent growth, or have a combined loss of jobs and wages from 1990 to 2000. Finally, a location quotient is used to determine high concentrations of employment and wages in a particular area. A location quotient of one or greater in employment and wages shows a significant competitiveness in that cluster.

1. The industry outlook for 2002 to 2012 period shows that administrative support and health and educational services industries account for over half (56.3%) of the new jobs that will become available. Administrative and support services, educational services and nursing, residential care facilities and ambulatory health care services will account for the majority of new jobs.
2. The manufacturing industry typically generates jobs in other major industry groups like transportation, health services, retail and wholesale trade, finance and leisure and hospitality. In 2000, the manufacturing industry peaked in employment at 251,400

(pre-recession) compared to the 222,900 employments in 2004. Manufacturing is still 28,600 short of its peak level in 2000.

During the recovery period, which has extended from 2000 through 2004, construction, finance and education and health services have accounted for most of the state's job growth.

3. The manufacturing industry has a significant impact on the growth/decline of other major industries in the state. Low interest rates have been instrumental in the employment growth that has occurred in construction (home building) and finance (refinancing) over the past couple of years. Economic development programs like the Iowa Values Fund and Vision Iowa have also been instrumental in funding local construction projects across the state.
4. The Biotechnology Industry cluster is being transformed by technology. Indian Hills Community College received funding from the President's Initiative to train workers currently in this industry cluster as well as provide training for middle and high school students about career opportunities in the biotechnology cluster.

The manufacturing workplace has been greatly transformed over the past 15 years. Companies in this industry are partnering with post-secondary institutions to provide training programs that prepare workers for the advanced technologies that have been introduced in the state's manufacturing workplaces.

5. The industry outlook for the 2002 to 2012 period shows that administrative support and health and educational services industries account for over half (56.3%) of the new jobs that will become available. Although this is not a new or emerging industry, it will account for the majority of new jobs.

D. Strategies to Promote/Develop Partnerships

The State Workforce Development Board has consistently maintained a focus on state and national issues, and has always incorporated emerging issues and strategic directions into its planning process. A significant part of that focus is given clarity through regular communication with the primary employment and training entities. State agency department heads and representatives from national organizations and agencies have been regular attendees at board meetings to provide their latest perspective on employment and training issues. Attendance at national conferences and meetings provide further background and depth for the Board Chair and support staff.

The Board has established an on-going strategic planning process to incorporate this information and knowledge into its goals and policy direction. The value of that information to the process is evident in the current strategic plan of the Board, as well as this plan. Those goals include both long-term and short-term goals. The long-term goals are to:

- ◆ Increase the size of the skilled workforce;
- ◆ Increase Iowans' earned income; and
- ◆ Grow the targeted industries and needed workforce skills.

For the more immediate future, the State Board recently updated its short-term “action” goals, which include:

- ◆ Establish sustainable collaborations with other state agencies;
- ◆ Expand customer-driven services and proactive workforce policy at the community and state levels;
- ◆ Educate key Iowa stakeholders, employers, and the general public on critical workforce issues;
- ◆ Promote Iowa’s workforce system and serve “nontraditional” workers; and
- ◆ Provide advice for Iowa’s workforce information products and services.

These strategic planning efforts are also essential to developing and maintaining partnerships with the major players in the employment and training system. These partners include business and industry, economic development, the public workforce system, and education.

For example, Iowa Workforce Development partners in regional marketing grants with the Iowa Department of Economic Development and IWD staff members coordinate economic development activities, business outreach and business services with groups such as the Professional Developers of Iowa, and Employers Councils of Iowa.

IWD also partners with private business, colleges and universities and government agencies in the sponsorship of the Science Education Mobile Instruction (SEMI), a world-class life sciences and biotechnology lab on wheels – a 53 –foot semi-trailer. This lab will travel to central Iowa schools where students will experience real-world life science concepts. Science teachers will also use the lab for professional development. The primary goal is to increase student exposure to and interest in biotechnology careers.

E. Strategies to Support Training

Support of training requires two primary strategies: 1) ensure that sufficient system resources exist; and 2) focus the available resources on training for high-growth/high-demand industries.

In terms of providing resources to the workforce development system, Iowa is challenged because federal workforce development funding has declined consistently over the past two decades. During the same period, Iowa has consistently provided additional state funds to the system. Over twenty years ago, Iowa established the Industrial New Jobs Training Program that uses tax increment financing to provide customized training for firms that create new jobs in traded (i.e., wealth generating) industries. A variation on this funding mechanism has since been put in place to provide for customized incumbent worker training for eligible firms. Another example of state-funded training is the Accelerated Career Education program that helps community colleges to respond promptly to the training needs of certain employers.

Most recently, during a time when Iowa, like most states, has faced severe budget constraints, the biggest single new budget initiative has been the Grow Iowa Values Fund. This fund addresses job

training, and provides financial assistance for economic development incentive programs, community revitalization, and related issues.

The second half of the strategy deals with focusing resources on training people for jobs in high growth/high demand industries. Most of the state resources described above are directed toward industries in the three targeted industry clusters (advanced manufacturing, life sciences, and information solutions), which were identified in large part because they include high growth industries. In fact, it is state policy to try to make them grow even faster, because they are also the industries that contribute most toward improving Iowa's standard of living. The total state funding for these programs is well in excess of the funds received under the Workforce Investment Act and other federal programs, so Iowa has demonstrated an excellent track record of assuring that resources are available for high growth/high demand industry training.

Iowa policy makers recognize that some resources should not be targeted exclusively to training in the targeted industry clusters. The retail sector, for example, is not included in the targeted industry clusters even though it is a "high growth, high demand" industry because retail tends to redistribute existing wealth in the local economy rather than generate new wealth. Nonetheless, the retail industry provides numerous, valuable opportunities for many people in the labor market, including youth or others who are entering the workforce and for others who, for various reasons, wish to work part-time. Federally-funded programs under the Workforce Investment Act and Temporary Assistance for Needy Families provide assistance, including training, for people entering high growth, high demand industries such as retail.

Finally, career-counseling staff in the federally funded training programs, as well as the state's public education system, are receiving information about career opportunities in Iowa's targeted industry clusters. This information helps them to make sound career decisions that take into account existing and projected opportunities, as well as industries for which Iowa is making priority investments.

One initiative involves Iowa Workforce Development, Iowa Department of Economic Development, Iowa Biotechnology Association, Iowa Renewable Fuels Association, and Des Moines Area Community College who are key partners with Indian Hills Community College (IHCC) in receiving one of the President's High Growth Job Training Initiative grants. This grant established a collaborative, statewide approach to growing the biotechnology industry. The grant amount was \$996,250 and \$231,474, and was leveraged from the community college for this training initiative, which will educate middle and high school students and Job Corps participants about biotechnology/bioprocess career options, and coordinate multiple opportunities for science teachers to build curriculum and skills in the field. This project will also develop and deliver training programs for Iowa's rapidly growing ethanol industry. IHCC will develop curriculum for biotechnology technicians specializing in proteomics, a new field that seeks to identify and understand the protein cells produced in different situations.

F. Strategies to Support Small Business

Iowa Workforce Development is a primary resource for Iowa businesses to find workforce information and solutions. Iowa Workforce Development provides the following services to Iowa businesses.

- ◆ Training to employers on how to use IWD services and products.
- ◆ Enhancements of the Labor Market Information display system on the web. This new site will assist business in finding all of the solutions and resources for their workforce needs in one location (including tax and regulatory information, OSHA consultation services, workforce center services, and local data to assist in daily business decisions that may include recruitment, retention, and expansion).
- ◆ Business Closings/Downsizings: IWD staff and its partners are ready to help employees make the transition to other employment. Laid-off workers are provided access to services, including financial support and training.
- ◆ Each region has Business Service Representatives to assist local businesses with recruitment needs, large or small, coordination of career or employment fairs, and access to IWD products and services.
- ◆ Career and employment fairs are held in all regions in Iowa, offering employers and job seekers the opportunity to interact at a single location.
- ◆ Employers' Council of Iowa adds a business perspective in advising Iowa Workforce Development. They provide opportunities for businesses to exchange information and develop education programs for businesses.
- ◆ Iowa Access provides services to help persons with disabilities be productive members of the Iowa workforce. Workforce partners in Iowa have developed information and resources designed to match the skills of Iowans with disabilities with careers for Iowa's job seekers, businesses and workforce service providers.
- ◆ IWD provides meeting space to interview or test prospective applicants away from the office.
- ◆ New Iowans Centers are designed to support workers, businesses, and communities with information, community service referrals, job placement, translations, language training, and resettlement assistance, as well as technical and legal assistance concerning forms and documentation.
- ◆ To find a broad range of employees to choose from, jobs listed with IWD are posted in our local offices, regional job listings, and on multiple Internet sites.
- ◆ IWD field auditors work with new and existing employer accounts, including assistance with determining tax liability, current and delinquent quarterly reporting, auditing of employer records, and determining worker status.
- ◆ IWD staff can administer - at no charge to the business or job seeker - proficiency tests for Typing, 10-Key and Data Entry.

The Business Education Center (BEC) is a partnership of education, government and private sector organizations who believe that preparing the future workforce is more about the synergy of a good partnership than it is about individual success. Iowa Workforce Development is dedicated to the concept that knowledge is power. The intent of the BEC is to promote workforce development through youth and educator linkages to business that will emphasize the power of the workplace as a learning environment.

Iowa employers who hire hard-to-place job applicants may be eligible to receive federal income tax credits under one of two programs—Work Opportunity Tax Credit (WOTC) and Welfare-to-Work Tax Credit (WtWTC). Iowa employers that meet certain criteria are allowed an additional deduction on their Iowa income tax returns for hiring ex-offenders or persons with disabilities. Only those employers that meet the "small business" definition can claim the deduction for employing persons with disabilities.

Iowa offers a wide range of strategically designed, proactive initiatives available to small business, including tax credits, loan programs and technical assistance programs. They include the following:

- ◆ Targeted Small Business (TSB) Financial Assistance Program is designed to create and expand minority- or women-owned businesses through direct loans of up to \$25,000 and loan guarantees of up to \$40,000. The TSB Financial Assistance Program is designed to assist in the creation and expansion of Iowa small businesses that have annual gross sales of less than \$3 million and are at least 51 percent owned, operated and managed by women, minorities or persons with a disability. The business must be certified as a "Targeted Small Business" by the Iowa Department of Inspections and Appeals before applying for or receiving TSB funds.
- ◆ The Iowa Loan and Credit Guarantee Fund is designed to help businesses that are having difficulty accessing conventional financing. The fund provides lenders with additional security, thereby encouraging greater lender activity to Iowa businesses. In agreeing to insure a business loan, the Iowa Department of Economic Development assumes responsibility for up to 50 percent of a loan made by a lender should the business default or otherwise be unable to make scheduled payments.
- ◆ The EDSA program provides financial assistance to companies that create new employment opportunities and/or retain existing jobs, and make new capital investment in Iowa. The EDSA program assistance is targeted toward business projects located in community populations of fewer than 50,000. At least 51 percent of the created/retained employment opportunities must be made available to individuals presently earning wages defined as low-and-moderate income.
- ◆ The Value-Added Agricultural Products and Processes Financial Assistance Program (VAAPFAP) seeks to increase the innovative utilization of Iowa's agricultural commodities. It accomplishes this by investing in the development of new agri-products and new processing technologies. Any single project may apply for up to \$525,000 in assistance. Financial assistance is provided in the form of loans and forgivable loans. Generally, assistance of \$20,000 or more is awarded as a combination of loans and forgivable loans, with the forgivable portion decreasing as the award size increases.

- ◆ The Self-Employment Loan Program (SELP) offers low-interest loans of up to \$10,000 to low-income owners of new or expanding small businesses. This program is designed to assist in the creation and expansion of businesses owned, operated and managed by women, minorities, or persons with a disability.
- ◆ The Entrepreneurs with Disabilities (EWD) program helps qualified individuals with disabilities establish, acquire, maintain or expand a small business by providing technical and financial assistance. To be eligible for the program, applicants must be active clients of the Iowa Department of Education Division of Vocational Rehabilitation Services or the Iowa Department for the Blind.
- ◆ The Assistive Device Tax Credit assists Iowa small businesses reduce their taxes by buying or renting products or equipment, or by making physical changes to the workplace to help employees with disabilities get or keep a job.

G. Statewide Activity Funds

The strategic vision and goals of the Governor and the State Workforce Board are further enhanced by the directed use of funds reserved for statewide activities. More detail is provided later in this plan, but some primary uses of those funds include: • providing incentive awards to local Boards that successfully achieve performance measures in the WIA system; • promoting services to at-risk youth; and • supporting local economic development activities through analysis of labor markets and worker skill levels. These initiatives are clearly supportive of national strategic directions that emphasize successful training for program participants, enhanced services for the most needy youth, and economic development.

H. Strategies to Promote Collaboration for Youth

Iowa's strategies to promote collaboration between the public workforce system with other youth serving agencies will build on existing partnerships to better serve youth that are most in need. These strategies include enhancing the work that IWD has done with education, human services, juvenile justice, vocational rehabilitation, economic development and others to connect youth with services and opportunities that will lead to education and training opportunities.

Labor Market Information: Iowa's development of a demand-driven model with business and industry to develop strategies for bringing youth into the workforce with the proper skills and training is an ongoing effort. This effort includes the work of the IWD Division of Policy and Information and relies on Labor Market Information and other data collected and reported on employment, payment, hours and earnings, employment statistics, laborshed studies, local employment dynamics, and occupational and industry projections, job outlooks and wage surveys. This type of information, coupled with input directly from business and industry, economic development and education, keeps both state and local youth staff keenly aware of high growth industries, types of employment available in those industries and skills needed for those jobs.

Alternative Education: Iowa has a strong alternative education system in the major metropolitan communities. Because of the rural make-up of most of the school districts in Iowa, alternative schools are not common across the state. As Iowa continues to consolidate school districts, alternative schools may become more available to youth that cannot succeed in a traditional school

environment. The rollout of the Department of Education's Learning Supports mentioned later in this section is an effort to enhance learning for all youth and reduce the number or drop outs thus decreasing the need for alternative education opportunities. In the meantime, state-level conversations are under way to improve alternative education options for youth in Iowa.

Iowa Collaboration for Youth Development: The ICYD work has forged strong partnerships at the state level. State strategies continue to support these state-level efforts and build additional support for stronger partnerships at the local level. Local staff of youth-serving agencies in Iowa are offered shared training, encouraged and supported to connect with each other to develop individual plans for youth that will lead to appropriate education and training opportunities leading to successful employment. The youth served through the workforce development system in Iowa arrive with multiple barriers to success. Without careful collaboration with other systems such as education, human services, juvenile justice and others, these youth are not able to develop the assets they need to be successful in education and training that lead to meaningful employment.

Iowa Workforce Development has been a key player in collaborating with many partners of the ICYD. The collaborative efforts include working with the foster care system to help develop and implement Iowa's plan for providing services to youth aging out of foster care. IWD staff has been involved with the foster care education and training assistance program, which was designed to include eligibility for the state's WIA services as an effort to avoid duplication in collecting this information.

IJAG: Governor Vilsak brought Iowa's Jobs for America's Graduates (IJAG) to Iowa. IJAG is a dropout prevention program run by a non-profit and continues to be funded with IWD state discretionary funds. This program's goals include preventing youth at risk-of dropping out of high school from dropping out and providing opportunities for youth to enter continuing education, training or employment following high school.

Regional Programs: Local initiatives target youth-in-need populations; model programs are in Iowa Region 16 (Burlington) and Region 11 (Des Moines). In Region 16 the local Youth Advisory Council and Regional Workforce Investment Board have targeted youthful offenders and out-of-school youth. The vast majority of the youth enrolled in WIA in this region are out of school; and the majority of enrollments in this region's primary county are youthful offenders. Strong partnerships with the local corrections and youthful offender agencies are in place for this initiative to succeed. In Region 11 a Business Education Center continues a partnership developed under the state's school-to-work initiative. This partnership works with employers to identify skills and knowledge needed by the upcoming workforce to support training in demand-driven occupations. Also, educators are provided information on what has been referred to as soft skills needed by employers and where and how they may access career exploration opportunities for students in the Region 11 area. The partners here include representatives from the local workforce system, community college, Area Education Association, local school districts, Iowa Association of Business and Industry, and economic developers. The plan is to replicate this type of initiative across the state.

I. Strategy to Identify Impediments

Throughout all of the initiatives described above, regular feedback from system staff and customers is used to identify impediments to a successful service delivery system. Consistent analysis of that information is used to initiate policy and regulatory modifications.

J. WIA Waivers

In order to effectively use the flexibility afforded by the waiver process, and to further enhance the efficiency of program operations in the state, Iowa requests the following waivers:

1. Policy and Procedures for Continuing Eligibility of WIA Training Providers: Iowa is requesting an extension to the existing waiver to extend the period of “Initial Eligibility of Training Providers” through the end of this two year planning cycle, thereby postponing the “Subsequent Eligibility of Training Providers” determination period. This request is a waiver from the Workforce Investment Act Section 122 (c) (5) and 20CFR 663.530. The extension is needed to maintain the broadest range of eligible providers to enable individuals to make informed choices relating to their training goals.

Iowa is committed to the philosophy of maximizing customer choice and assuring that all significant population groups are served. This waiver, if approved, will provide us with the increased flexibility to meet the standards required by the Workforce Investment Act and ensure state and local accountability for the results of our system.

2. Transfer of Funds Between Adult and Dislocated Worker Programs: In order to be afforded maximum flexibility to respond to the needs of workers and job seekers, Iowa requests a waiver to allow the transfer of 100% of funds between the Adult and Dislocated Worker funding streams. Such a waiver will allow regional boards to respond to specific needs in their areas that may be created by significant numbers of worker dislocations, changes in the local economic environment, intent to increase services to specific populations, or similar issues. This request is a waiver from the Workforce Investment Act Section 133(b)(4), and 20CFR667.140.

Iowa is committed to customer service, and this waiver will provide the flexibility to meet customer needs as they arise. The waiver will support both federal and state goals to support the local direction for resource use, will continue to emphasize the training element of the WIA program, and will provide the flexibility of merged funding streams while maintaining core service delivery in the One-Stop Centers supported by Wagner-Peyser funding streams.

Regional Workforce Investment Boards must initiate any requests for the transfer of funds. State policies will be established to ensure that such transfers will not negatively impact performance achievement or the potential to acquire additional program resources, such as National Emergency Grants. In such cases, the state will have the authority to deny transfer requests.

VI. MAJOR STATE POLICIES AND REQUIREMENTS

A. Data Collection/Reporting, Information/Performance Management, Service Delivery

The State of Iowa, through Iowa Workforce Development, maintains a statewide data collection system for its WIA and Wagner-Peyser programs. Since all service providers are required to use the system, data collection and reporting is consistently available and up-to-date. The system provides standardized reports and analysis of data that is used by local boards and service providers to make strategic program and administrative decisions. It also provides the opportunity for in-depth statistical analysis at the state level, leading to more directed technical assistance and training opportunities. The overall result is more integrated service delivery and improved performance achievement.

B. Use of Administrative Resources

To a significant extent, the limited resources available to the 16 workforce investment areas in Iowa have already driven the one-stop systems to efficiencies in the form of partner co-location, minimal administrative structures, and combined responsibilities for fiscal agents and service providers. The State Board and Iowa Workforce Development support these efficiencies by providing basic oversight and some supported administrative functions.

State policies also direct efficiencies in the administrative layers at the regional level. None of the regional boards in Iowa are incorporated, thereby preventing them from directly receiving funds and operating programs. Instead, the RWIBs and Chief Elected Officials in each region select a fiscal agent to receive funds on their behalf and expend those funds in accordance with the local plan and through the service providers selected by the boards. The fiscal agent, One-Stop operator, and service providers are identified in the local plan. In many regions of the state, one entity fulfills all of these roles, thereby reducing excessive administrative layers and related administrative costs. Although the potential for conflict of interest is increased by this reliance on a single entity, both state and local oversight measures are in place to ensure the integrity of the programs. Iowa Workforce Development contracts directly with the fiscal agent that the boards identify in the local plan, and implements appropriate contract procedures and policies governing the management and use of program funds.

C. Universal Access and Consistency of Service

Workforce Investment Act program services are provided in accordance with a state-issued policy handbook. That document provides extensive policy direction to local service providers in all phases of the program structure and operation. Wagner-Peyser services are delivered by state merit staff under the direction of Iowa Workforce Development. The direction provided by the WIA handbook and IWD operations ensure that universal access to programs and consistent services are provided to system customers. In addition, the statewide information system provides a foundation for the tracking of services in the one-stop system and in turn promotes a technological framework for universal access and consistent services.

D. Demand-Driven Workforce Investment System

In 1996, Iowa passed workforce development legislation that consolidated several workforce programs into a new agency, Iowa Workforce Development (IWD), along with a new governance and oversight structure for the workforce development system. When the federal Workforce Investment Act was enacted, this governance structure, including the state Iowa Workforce Development Board, was grandfathered in and remains in place. In addition to the functions performed by this Board under the federal Act, the IWD Board serves as the board of directors for the state agency, with approval authority over certain portions of its budget and administrative rules.

This unique relationship between the Board and the state agency has resulted in a particularly strong working relationship concerning a wide range of services, including workforce information. The Board is consulted concerning new or ongoing workforce information services at virtually every meeting, and has formal opportunities for consultation on the Workforce Information Core Products and Services at least annually. In the past year, the Board received a complete review, with ample opportunities to provide feedback, at its November 2003 meeting and was consulted formally again at its September 2004 meeting.

The workforce information staff members contribute directly to the planning process by providing both data and analysis of the state's economic and workforce needs. In fact, workforce information staff drafts portions of the plan. Workforce information products and services are also instrumental in implementing the plan. The goals of the Iowa five-year workforce plan are as follows:

- ◆ Increase the size of the skilled workforce;
- ◆ Increase Iowans' earned income; and
- ◆ Grow targeted industries and needed workforce skills.

In general terms, workforce information products and services support these goals by providing employers, employees, and other customers and stakeholders with reliable information about the labor market so that they can make sound decisions. This information contributes to meeting Iowa's goals in many ways, including helping:

- ◆ students and employees make good education and career decisions;
- ◆ employers make appropriate investments in developing their own pools of workers;
- ◆ educators and job training officials with their investments of public funds;
- ◆ employees and employers to make informed decisions involving prevailing wage rates in the labor market;
- ◆ public and private officials identify existing and potential industry clusters for targeting economic development investments; and
- ◆ community economic development officials to detail the availability of labor in specific labor markets.

As already noted, IWD's workforce information staff members interact routinely with the state IWD Board, and therefore frequent personal opportunities for consultation and feedback exist. IWD's

workforce information unit has offered in-person presentations, training and consultation to local workforce investment boards and the staff of the One-Stop Centers. While some boards avail themselves of these opportunities more often than others, all have taken advantage of them on occasion. Consultation is also done through face-to-face meetings, requests for information, and training for intermediate and end users in how to use workforce information.

Special presentations and discussions take place several times each year at meetings of regional managers of Iowa's workforce development system. Typically, these involve new products and services that the sub-state regions might find especially useful, but they also afford time for consultation on other matters.

Additional consultation comes about in the course of providing staff support and serving as resource experts to key stakeholder groups such as educators and economic developers. Workforce information staff are directly engaged in state and local business/education efforts as well as state education policy reform initiatives.

All of the activities undertaken with the Workforce Information funds will help support the local Workforce Development Centers and partners by providing the underlying information on the labor markets in which those centers function. For example, the workforce information unit provides data and analysis for needs assessments and to assess the basic economic and labor market trends/environment in which workforce development services are provided

E. Job Corps and Apprenticeship Integration

Iowa has one Job Corps Center in Denison, which is located in Region 8. The Job Corps Center participates on the local RWIB and is a partner in One-Stop operations in the region. In addition, Job Corps recruiters are on-site in many of the One-Stop Centers of the state to act as resources for the center staff and points of referral for appropriate youth. This arrangement contributes to the overall seamless delivery of services to customers, as envisioned by the WIA statute. Youth across the state are referred to Job Corps as appropriate.

Apprentice programs in Iowa are integrated into the One-Stop system at both the administrative and operational levels. Because of the significant representation of labor organizations on both state and local workforce boards, apprenticeship interests have a vehicle for direct input into the planning and oversight activities of the system. This presence and function is carried into program operations through the direction of the boards, and through the efforts of local service providers. All One-Stop Centers have apprenticeship information available in their resource rooms, as well as on websites.

VII. INTEGRATION OF ONE-STOP SERVICE DELIVERY

A. Quality Assurance for One-Stop Centers

The State of Iowa initiated the concept of one-stop services prior to the passage and implementation of the Workforce Investment Act. In 1996, Iowa law was established that revamped significant portions of the employment and training system in Iowa in an effort to bring more programs and services under the guidance of local boards, and to more clearly define a network of offices through which such services would be delivered. While those concepts were still being debated at the national level, Iowa moved ahead.

Through this state legislation, regional boundaries were established, a State Board was appointed, new regional boards were defined and appointed, and specified employment and training programs were required to provide coordinated and comprehensive services in a one-stop environment. With the implementation of the WIA statute, many of its features were already in place. For that reason, Iowa requested and received permission to grandfather the existing state and local boards to represent such boards as defined by the new Act. Existing state policies and procedures were also transitioned in their entirety or with minor modification to meet the requirements of the new law. The vast majority of the entities that were already providing employment and training services in the state continue to provide such services.

This situation has continued throughout the first five years of operation under the Workforce Investment Act. During that time, relatively few changes have been made to the system. However, programs and priorities in employment and economic development are constantly evolving, and the State Board is committed to the support and guidance of that evolution. During this two-year planning cycle, the Board will establish a certification process for One-Stop Centers, and will issue guidelines for the operating those centers. The development of this process will be conducted in coordination with state agencies, local boards, service providers, and other interested parties.

B. Service Delivery Integration in the One-Stop

The merger of multiple partners and services into a seamless delivery system in a well-integrated One-Stop Center requires planning, policy, and commitment. As a primary partner in each center, it is the policy of Iowa Workforce Development to provide a base level of core services, which in turn are complemented and enhanced by the partner services that may be of a more intensive level or involve training. In this way, integration is emphasized and duplication is minimized. This approach also promotes the maximum use of WIA funds for training activities.

Policy guidance for integrated service delivery in the One-Stop System is also provided in the state WIA Handbook. That guidance takes the form of requirements for establishing the basic structure of oversight boards and service providers in each workforce investment area, as well as direction on coordinated service provision to both business and individual customers.

Much of the policy guidance provided by the state emphasizes the need for the local plan to address issues of service integration. That document must provide a description of the One-Stop system in

terms of administrative and organization structure, and also in terms of operational efficiencies and service integration. The local plan includes the following elements that address service integration:

- ◆ A description of the access points through which center customers can receive services;
- ◆ A description of the products and services that will be available at each of the access points;
- ◆ A summary or flowchart of the service delivery system, identifying how customers will be served and referred within the center system and how program services will be provided to employers, job seekers, and other customers;
- ◆ The type and availability of adult and dislocated worker employment and training activities in the region, including a description of the local Individual Training Account (ITA) system;
- ◆ The type and availability of youth activities in the local area, including an identification of successful providers of such activities; and
- ◆ A Memorandum of Understanding between the local boards and system partners that describes the coordination of services, accessibility to partner services, sharing of costs, and methods of participant referrals.

Furthermore, the State Workforce Board will be addressing criteria for establishing a certification process for one-stop centers in the State. This process will further address issues of integrated service delivery, and provide guidance to ensure a maximum degree of service coordination in each One-Stop Center.

C. Identifying One-Stop Infrastructure Costs

As noted above, state policies require that Memorandums of Understanding (MOUs) address the sharing of One-Stop infrastructure costs, and these documents are part of the local plans. These policies also require that MOUs be reviewed each year, and modified as appropriate, based upon changes in service delivery processes, budgets, costs, or similar factors. Responsibility for this action rests with local boards and with regional partners.

State staff are responsible for oversight and monitoring of the quality and currency of the MOUs. The review of local plans provides the opportunity for an initial critique of the MOUs, and annual monitoring visits are used to ensure that the content and implementation of the MOUs are current and appropriate. This process also provides a vehicle for identifying any best practices or model agreements that may be subsequently shared among the regions.

D. One-Stop Support with Set-aside Funds

One-Stop delivery systems in Iowa are supported by state set-aside funds in several ways. One of the significant uses of set-aside funds in this regard is support for the statewide information tracking system. Iowa has always endeavored to provide a comprehensive tracking system for its programs, in recognition that a network of One-Stop Centers and programs is best supported by a coordinated network of data tracking. The comprehensive reports and query capabilities provided by this system

are essential to program analysis at both the state and local levels, leading to data-driven decisions that improve system quality and efficiency.

Set-aside funds also support the employment and training system by providing direct funding to program operations. Fully one-third of set-aside funds are provided in the form of incentive awards to regions that demonstrate exceptional levels of performance achievement. Local boards make the determination as to the use of incentive awards, which are as flexible as any funds within the WIA funding streams. Iowa also awards targeted grants from set-aside funds to provide services to special populations or business needs.

Other system operation support is provided by set-aside funding in the form of contracts for customer satisfaction surveys, research, staff development, and training.

E. Assured Focus on Business and Customer Needs

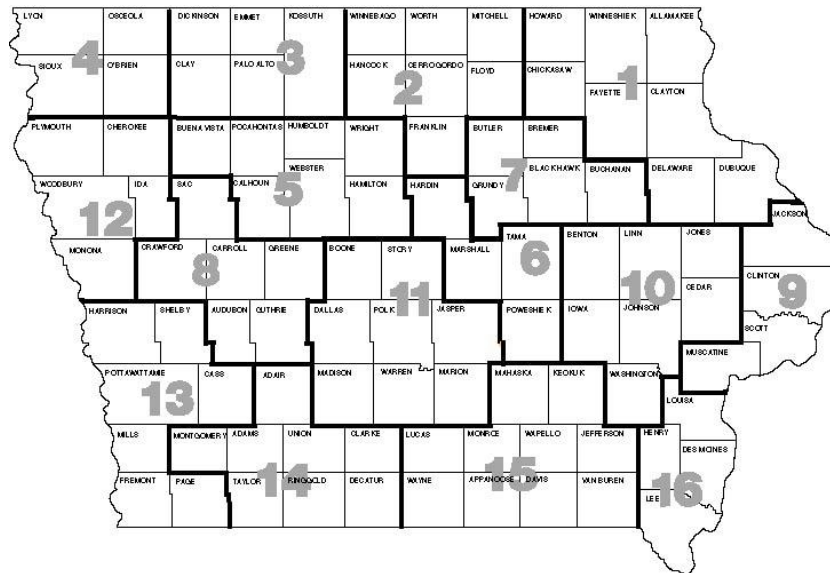
Resources in the One-Stop delivery system come in a variety of forms. Some partners contribute funding for core services, intensive services, and training, while others may provide in-kind services. Regardless of the form, the Regional Customer Service plan is the mechanism employed by the state to ensure these resources are focused on the individual business and customer needs.

The local planning guidance asks the local workforce investment board to specifically address the status of the labor pool in context with the labor market, identifying the workforce investment needs of business, job seekers, and workers in the region. The board will then describe how they will use its resources and oversight authority to address workforce needs in the region and develop the annual budget. The state will review and comment on each of these plans and, if necessary, make recommendations on how to maximize their resources to address local workforce needs.

The success of these planning efforts and their implementation is evaluated not only by program performance outcomes, but also by a variety of customer satisfaction surveys, forums, and customer comment opportunities. The WIA statute requires a base level customer satisfaction survey format that is used to determine achievement of a performance standard. Iowa's performance on that measure has always significantly exceeded the performance goals, for both job seekers and businesses. In addition to those surveys, Iowa Workforce Development makes customer comment and feedback opportunities readily available in One-Stop Centers, through its website, and through additional customer surveys. The establishment of Employers Councils of Iowa in each region of the State provides another level of input directly from businesses regarding IWD and One-Stop Center operations. Finally, the State has provided a number of forums and roundtables throughout the State, primarily focused on business, to further ensure that customer needs are being met.

VIII. ADMINISTRATION AND OVERSIGHT OF LOCAL WORKFORCE INVESTMENT SYSTEM

A. Local Area Designations



Iowa has 16 local Workforce Investment Areas. The original plan for the designation of regions under WIA suggested no change to the 15 regions created under Iowa Senate File 2409. However, a public process to gather input was conducted in 1999 that resulted in the designation of the current 16 Iowa regions. The State Workforce Board took action on February 11, 1999, to recognize and put 16 regions into service. The public input process proceeded as follows:

Date	Action
September 4, 1998	Released Information Memo announcing the establishment of multi-agency review teams to review the WIA legislation and provide recommendations.
December, 1998	Began review of implementation plan with Coordinating Service Providers
January 11, 1999	Released Information Memo on Iowa's Plan for the implementation of WIA and announced the establishment of a 'listserve' that would provide opportunities on implementation
January 19, 1999 January 21, 1999	Statewide video conference session on WIA implementation, involving Local Elected Officials, Private Industry Council members, and Regional Advisory Boards
January 26, 1999	IWD Board met to take oral testimony on WIA implementation, and make initial recommendations on implementation
January 27, 1999	Released Memo requesting written comments and announcing a public hearing in February
February 10, 1999	Statewide video conference public hearing sponsored by the IWD Board
February 11, 1999	IWD Board meeting, heard additional oral testimony on WIA implementation, made final recommendations.

The initial designation of local Workforce Investment areas roughly followed local labor markets and community college regions. However, an appeal was filed on behalf of six counties in west-central Iowa and an additional region was established for a total of 16 regions.

Appeals Process: While no further appeals of regional designation have been made, there is an appeal process established for such action. A unit or combination of units of general local governments may request designation as a local workforce investment area under the Workforce Investment Act of 1998. If that request is not granted by the Governor, an appeal can be made to the State Workforce Development Board within 30-days of the non-designation. The appeal must include the rationale as to why the designation decision should be rescinded.

If the State Workforce Development Board does not grant designation on appeal, the decision may be appealed to the Secretary of Labor within 30 days of the written notice of denial. The appeal must be submitted by certified mail, return receipt requested, to the Secretary, U.S. Department of Labor, Washington, D.C. 20210. The appellant must establish that it was not accorded procedural rights under the appeal process described in the state plan or establish that it meets the requirements for designation in the Workforce Investment Act of 1998 section 116(a)(2) or 116(a)(3). The Secretary will take into account any comments submitted by the State Workforce Investment Board.

B. Appointment of Regional Workforce Investment Boards

Because the grandfathered local boards must reflect both state and federal appointment processes, Iowa has established prescriptive policies for the appointment of local board members. These procedures are provided in Attachment 2.

C. Building Capacity of Local Boards

Enhancing the ability of local boards to effectively carry out their responsibilities to develop and manage high performing workforce systems requires the involvement of the State Workforce Board and Iowa Workforce Development. The State Board shares its goals and strategies with local boards through the state plan and various lines of communication, including face-to-face meetings to discuss workforce and economic development issues. Individual state board members attend local board meetings to further establish these relationships with local officials.

Iowa Workforce Development staff assumes the responsibility for providing training opportunities and technical assistance to local boards. In many cases this support is provided in collaboration with local service providers. Individual staff members are identified as WIA Regional Representatives and are assigned to specific local areas. These regional representatives assist with training and technical assistance, and provide local boards with data and information that complement the oversight and evaluation activities of the boards.

D. Local Planning Process

In accordance with Federal law and regulations, and Iowa administrative code, Iowa Workforce Development issues instructions and submittal requirements for local Customer Service Plans. These plans, developed and submitted by local boards, describe the economic and workforce

environment in each local area, and specify how the local board will use its authority and resources to address those needs and effectively operate the One-Stop system.

The IWD Division of Workforce Center Administration has the responsibility to assist local boards with the plan development process. WIA Regional Representatives, who are Division staff, acknowledge receipt of the plans on behalf of the State Board, and conduct a review of those plans. Negotiations of performance agreements are also conducted between local boards and Division staff.

The plan review process is designed to consistently evaluate local Customer Service Plans for conformance with federal and state requirements, and for consistency with the goals and objectives of the State Board. The plans are also used to provide input to the State Board on issues and activities that have implications for state wide planning efforts. Local plans are approved by the State Board.

E. Regional Planning

All of the Regional Workforce Investment Boards submit independent plans. There are no intra-state or inter-state plans from multiple regions.

F. Allocation Formulas

Sub-state Allocation Process for the Title I Youth Program Funds: Eighty-five percent of the funds Iowa receives for the WIA youth employment and training activities are allocated to the regions. Iowa allocates 70 percent of that amount using the following federally prescribed formula:

- ◆ 33 1/3% of the funds are allocated on the basis of the number of disadvantaged youth in each region compared to the total number of disadvantaged youth in the state;
- ◆ 33 1/3% of the funds are allocated on the basis of the excess number of unemployed individuals in each region compared to the total excess number of unemployed individuals in the state;
- ◆ 33 1/3% of the funds are allocated on the basis of the number of unemployed individuals in areas of substantial unemployment in each region compared to the total number of unemployed individuals in areas of substantial unemployment in the state.

The remaining 30 percent of regional allocations are based on the number of disadvantaged youth in each region as compared to the total numbers of disadvantaged youth in the state. This option is used to diminish the impact of unemployment concentrations dictated by the federal formula and focus on low-income youth.

The federal statute also requires that a “hold harmless” provision be applied to the WIA Youth funding streams. This provision ensures that each region will receive a share of funds of at least 90% of the average share of funds received by that region in the previous two years.

Sub-state Allocation Process for the Title I Adult Program Funds: Eighty-five percent of the funds Iowa receives for the WIA adult employment and training activities are allocated to the regions. Iowa allocates 70 percent of that amount using the following federally prescribed formula.

- ◆ 33 1/3% of the funds are allocated on the basis of the number of disadvantaged adults in each region compared to the total number of disadvantaged adults in the state;
- ◆ 33 1/3% of the funds are allocated on the basis of the excess number of unemployed individuals in each region compared to the total excess number of unemployed individuals in the state;
- ◆ 33 1/3% of the funds are allocated on the basis of the number of unemployed individuals in areas of substantial unemployment in each region compared to the total number of unemployed individuals in areas of substantial unemployment in the state.

The remaining 30 percent is allocated in two parts: 1) one-half is based on the excess number of unemployed in each region as compared to the total excess number of unemployed individuals in the state; 2) one half is based on the number of disadvantaged adults in each region as compared to the total number of disadvantaged adults in the state. In this way, allocation credit is provided to support low-income individuals in the state.

The federal statute also requires that a “hold harmless” provision be applied to the WIA Adult funding streams. This provision ensures that each region will receive a share of funds of at least 90% of the average share of funds received by that region in the previous two years.

Sub-state Allocation Process for the Title I Dislocated Worker Program Funds: Of the funds received by Iowa for dislocated worker employment and training activities, the state allocates 70 percent to the regions using the following data and giving equal weight to each factor:

- ◆ **Insured Unemployment Data:** For the most recent 12-month period, the monthly average number of individuals who were receiving unemployment insurance.
- ◆ **Unemployment Concentrations Data:** Based on the most recent 12-month period, regions with unemployment rates above the state average.
- ◆ **Plant Closing and Mass Layoff Data:** The number of employees during the most recent 12-month period that were impacted by a mass layoff or plant closing.
- ◆ **Declining Industries Data:** During the most recent 24-months, the total number of jobs lost in the most recent four quarters as compared to the previous four quarters.
- ◆ **Farmer-Rancher Economic Hardship Data:** During the most recent 12-month period, the number of farmers/ranchers who have delinquent loans as reported by U. S. Department of Agriculture.
- ◆ **Long-Term Unemployment Data:** For the most recent 12-month period, the monthly average number of individuals who meet the definition of long-term unemployed. An individual is considered to be long-term unemployed if he/she was out of work for 15-weeks out of a continuous 26-week period of time.

For the dislocated worker allocation process, equal application of all six factors of the formula ensures that all possible economic and workforce elements that exist in each local area impact the allocation process. In this manner, factors that might favor or disadvantage certain areas are equally applied.

The factors and methods used in all allocation factors are discussed with State Board members as a part of the plan development process. That process also provides the opportunity for input and comment by local boards and other constituencies.

G. Provider Selection Policies

As required by the federal statute, providers of training services under WIA must be certified by regional boards. In Iowa, this certification process is governed by the following requirements.

1. Policy: The Regional Workforce Investment Boards, in partnership with Iowa Workforce Development, identify and certify training providers whose performance qualifies them to receive Workforce Investment Act funds to train Adults and Dislocated Workers. Training services are designed to equip individuals to enter the workforce and retain employment. A training program is considered to be a course of study that, upon successful completion, leads to a certificate, an associate degree, baccalaureate degree, or an employer-identified competency skill. Eligible training providers are:
 - ◆ Post-secondary educational institutions that are eligible to receive funds under Title IV of the Higher Education Act of 1965 and provide a program that leads to an associate degree, baccalaureate degree or certificate;
 - ◆ Entities that carry out programs under the “National Apprenticeship Act;” and
 - ◆ Other public or private providers of a program of training services.

Certification Process: An application for each program must be submitted to the Regional Workforce Investment Board in the region in which the training provider desires its program to be certified. Each program of training services must be described, including appropriate performance and cost information. A copy of the application is provided in Attachment 3. For initial eligibility, the Regional Workforce Investment Board may require additional information as necessary to certify or deny the request.

Responsibilities: The Regional Workforce Investment Board will be responsible for:

- ◆ Accepting applications from postsecondary educational institutions, entities providing apprenticeship programs, and public and private providers for initial and subsequent eligibility.
- ◆ Submitting the local list of eligible providers, including performance and cost information for each program to Iowa Workforce Development.
- ◆ Ensuring the availability of the statewide list to participants in employment and training activities and others through the regional Workforce Development Center system.
- ◆ Consulting with Iowa Workforce Development in cases where decertification of an eligible provider is contemplated because inaccurate information has been provided.
- ◆ Notifying all known providers of training in their region regarding the process and timeline for accepting applications.

Iowa Workforce Development will be responsible for:

- ◆ Establishing initial eligibility criteria as well as setting minimum levels of performance for public and private providers;
 - ◆ Setting minimum levels of performance measures for all providers to remain subsequently eligible;
 - ◆ Developing and maintaining the state list of eligible training providers, compiled from information submitted by the Regional Workforce Investment Boards;
 - ◆ Verifying the accuracy of the information on the state list;
 - ◆ Removing providers who do not meet program performance levels;
 - ◆ Decertifying training providers who provide inaccurate information; and
 - ◆ Decertifying training providers who violate any provision of the Workforce Investment Act.
2. Soliciting Recommendations: The State Board has empowered the local boards to do outreach and recruitment of training providers within their regions. The board ensures input from interested members of the public including representatives of business and labor organizations.
3. Maintaining the Eligible Provider List: Iowa Workforce Development is responsible for maintaining the Eligible Provider List. This information is available and easily accessible to program participants and service providers on the IWD web page.

The state's approved training provider system currently contains 106 training providers offering 1,189 individual training programs. The state's community colleges, universities, private for-profit, and non-profit training agencies are listed on the WIA Certified Training Provider website located at: <http://www3.iwd.state.ia.us/wia/trainingproviders.nsf/>

4. Appealing Denial of Eligibility: If a training provider has been determined to be ineligible by either failing to meet performance levels, intentionally supplying inaccurate information, or violating any provision of the Workforce Investment Act, it has the right to appeal the denial of eligibility to Iowa Workforce Development. The procedures provide an opportunity for a hearing and prescribed time limits to ensure prompt resolution of the appeal. Training services providers have the opportunity to appeal:
- ◆ Denial of eligibility by a Regional Workforce Investment Board or Iowa Workforce Development;
 - ◆ Termination of eligibility or other action by a Regional Workforce Investment Board or Iowa Workforce Development under the Workforce Investment Act of 1998 section 122(f); or
 - ◆ Denial of eligibility as a provider of on-the-job training or customized training by the Coordinating Service Provider.

All appeals must be filed to Iowa Workforce Development within 30 days of receipt of written notice of denial or termination of eligibility. Appellants must follow the procedures for a complaint described above in this section. Appeals will be handled in the same manner as a complaint.

5. Award of Grants and Contracts under Title I WIA: Procurement policies used to award grants or contracts under Title I WIA are provided in Attachment 4.
6. Awarding Grants for Youth Activities: These same policies of Attachment 4 are used in the award of grants for youth activities.

H. One-Stop Policies

1. Coordination of Partner Services and Use of Wagner-Peyser Funds: Effective coordination of services with the One-Stop system requires the commitment of the multiple partners in the system, and is built on a structure of agreements and contracts. However the Memorandum of Understanding (MOU) is the most essential document to support effective partnerships. The quality of the regional MOU and the commitment of partners to that agreement comprise the basis of regional coordination of services.

The RWIB and CEO in each region are charged with ensuring that services are coordinated and focused on the workforce priorities established by the Board. The MOU is used to carry out this responsibility.

State policy requires that, at a minimum, MOUs include the following information:

- ◆ The services to be provided through the Workforce Development Center System. These include: • the location of the comprehensive Workforce Development Center(s), as well as other locations where each partners' services will be provided; • a comprehensive list of services that are made available with the assurance that there will not be a duplication of service; • availability of core, intensive, and training services mandated by the Act are seamless in the designated One-Stop center(s); and • a description of how core services will be delivered.
- ◆ An explanation of how the costs of the services to be provided through the Workforce Development Center System and how the operating costs of the system will be funded. This gives each partner the opportunity to describe the resources they bring to the system and the approximate value.
- ◆ The methods for referral of individuals between the Workforce Development Center System Partners. It is critical that the partners ensure that customers receiving intensive and training services are tracked in the system for performance outcomes and customer service.
- ◆ The duration of the Memorandum of Understanding. The MOU identifies within itself the starting and expiration dates.

- ◆ The procedures for amending the Memorandum of Understanding.

Within the One-Stop system, Wagner-Peyser funds are used to provide the basic structure for core services for One-Stop customers. The One-Stop infrastructure in Iowa depends on the Wagner-Peyser Act and corresponding staff for:

- ◆ Resource rooms that deliver self-help and facilitated self-help job search services;
- ◆ Intake, initial skills assessment, and referral to supportive services;
- ◆ Job search and related workshops;
- ◆ Labor exchange, including the intake of job orders, applicant screening, and referral;
- ◆ Outreach to target populations, businesses, and economic development;
- ◆ Provision of labor market information;
- ◆ Re-employment services to unemployment insurance claimants;
- ◆ Initial core services to workers dislocated by plant closings and mass lay-offs; and
- ◆ Information on how and where to file for unemployment insurance.

2. Oversight and Technical Assistance: Iowa Workforce Development conducts monitoring and oversight activities of the One-Stop system to One-Stops on a statewide and local area basis. Five IWD staff are identified as Regional Representatives, each assigned to specific regions of the state, to help the local areas identify those items that need improvements and/or provide technical assistance. These Regional Representatives monitor WIA system and program operations, communicate with local boards regarding performance and new program initiatives, and provide technical assistance to local service providers. As the liaison for multiple regions, they are in a position to share best practices and make recommendations for process improvements before performance issues arise.

In addition to the liaisons, Iowa Workforce Development provides state policy and procedure manuals for the adult, dislocated worker, youth, Wagner-Peyser, and TANF programs. Information memos describing changes in policy, procedures, and performance are distributed and maintained electronically.

3. Additional Mandated One-Stop Partners: Iowa does not have additional mandatory partners in its One-Stop system. However, the WIA adult and Wagner-Peyser programs are partners in the delivery of the PROMISE JOBS programs. PROMISE JOBS is the employment and training program for welfare recipients, funded under the Temporary Assistance for Needy Families (TANF) Act. This initiative, while not mandated, effectively engages the TANF program in Iowa's One-stop system.

I. Oversight/Monitoring Process

Program oversight occurs at multiple levels within the employment and training system. To some degree, this activity occurs at each administrative level, including the State Workforce Board, Iowa Workforce Development, local RWIBs and Chief Elected Officials, and Service Providers. This section primarily addresses the monitoring activities conducted by IWD, and the policies that direct such functions at the regional level.

Monitoring efforts at the state level are conducted in three areas: financial, program, and quality reviews. There are established policies and procedures to be followed in the performance of this monitoring, which promote the effective utilization of public funds while providing procedures to ensure that the objectives of the programs are being met.

Financial Compliance: The Administrative Services Division conducts financial compliance reviews annually. These on-site reviews include all programs administered through written agreement between IWD, the sub-recipient, and the Fiscal Agents. Monitoring of non-Fiscal Agent entities is limited to those subcontractors of IWD that receive \$100,000 or more during the fiscal year. Items reviewed for compliance include: • system handbooks; • contractual agreements; • Memorandum of Understanding; • General Accepted Accounting Principles; • resource sharing agreements; and • cost allocation plans.

There are three steps to the financial compliance monitoring process: 1) Initial Determination – a report that describes the specific findings with recommendations and timeframes established for corrective actions by the region; 2) Final Determination – a report provided to the region that discusses remaining unresolved findings and notes disallowed costs; and 3) Follow-up – conducted during the following fiscal year to review corrective actions taken in response to the findings.

Appeals may be submitted on behalf of the service provider within ten days of the date of the Final Determination and are reviewed by a three-member team of staff not involved in the initial monitoring effort. Decisions on the appeal are rendered by a majority vote.

Program Compliance: The Workforce Development Center Administration Division monitors programs in each of the 16 Iowa regions annually. The reviews focus on the designated service providers for various programs and ensure local compliance with the applicable state and federal regulations. The on-site reviews include: • activities and services; • applicant and participant process; • participant eligibility; • participant file review; • procurement procedures; • management information systems; • local plans; and • program performance.

There are three steps to the program compliance monitoring process: 1) Initial Determination – a report that describes the specific findings with recommendations and timeframes established for corrective actions by the region; 2) Final Determination – a report provided to the region that discusses remaining unresolved findings and notes disallowed costs; and 3) Follow-up – conducted during the following fiscal year to review corrective actions taken in response to the findings.

Appeals may be submitted on behalf of the service provider within ten days of the date of the Final Determination and are reviewed by a three-member team of staff not involved in the initial monitoring effort. Decisions on the appeal are rendered by a majority vote.

Quality Review: With a focus on overall One-Stop Center performance, customer satisfaction, and continuous improvement, quality reviews are conducted annually. Areas of strength and the methods employed to achieve standards will be documented and incorporated into a list of best practices to be shared in other parts of the state. In the event system performance standards are not being met, the objective of the review will be to help identify methods for improvement. When the same issue is identified for two consecutive years, a corrective action plan will be required.

Among the items included in the quality review are: • Memorandum of Understanding (MOU); • joint grant applications; • integration of services without duplication; • level of participation by required and voluntary partners; • unique funding and/or service delivery methods involving multiple partners; and • customer satisfaction.

An exit interview with the RWIB and coordinating service provider (CSP) will review the findings of the quality review. Methods for improving systems will be discussed and an agreement reached on their implementation. The CSP will have 14-days to respond to the finds and recommendation, at which time a final report is prepared and delivered to the RWIB chair.

Regional monitoring requirements are conducted at the local level. Attachment 5 provides the state policies that must be followed to conduct regional program oversight.

J. Grievance Procedures

Complaints may be filed with Iowa Workforce Development to resolve alleged violations of the Workforce Investment Act (WIA), Federal or State regulations, grant agreement, contract or other agreements under the Act. The grievance procedure is provided in Attachment 6.

In addition, each Coordinating Service Provider must establish procedures for grievances and complaints. The local procedures must provide:

1. A process for dealing with grievances and complaints from participants and other interested parties affected by the local workforce investment system, including one-stop partners and service providers;
2. An opportunity for an informal resolution and a hearing to be completed within two days of the filing of the grievance or complaint;
3. A process which allows an individual alleging a labor standards violation to submit a grievance to a binding arbitration procedure, if a collective bargaining agreement covering the parties to the grievance so provides; and
4. An opportunity for a local level appeal to Iowa Workforce Development when:
 - ◆ No decision is reached within 60 days; or
 - ◆ Either party is dissatisfied with the local hearing decision.

Participants, service providers and other interested individuals must be informed of the local complaint procedure in writing, as well as the ability and procedures to appeal local decisions to Iowa Workforce Development.

K. Policies that Facilitate Effective Local Workforce Investment Systems

1. Selecting One-Stop Operators and Service Providers: To receive funds made available under Title I of WIA, the Regional Workforce Investment Board (RWIB), in agreement with the Chief Elected Official (CEO) board, must designate an entity as the One-Stop operator, in Iowa called the Coordinating Service Provider (CSP), for the local workforce investment region. In addition, the RWIB must designate Service Providers for core and intensive services for Adults and Dislocated Workers, as well as a Youth Service Provider to provide day to day oversight of the Youth Program and to provide eligibility determinations, enrollment, objective assessment and individual service strategies for Youth.
 - a. Coordinating Service Provider: To designate a Coordinating Service Provider, the RWIB must utilize one of the three processes listed below. The RWIB may pursue more than one option concurrently.
 - ◆ An agreement with the Governor to designate the Coordinating Service Provider (CSP) that was in place on August 7, 1998. In order to utilize this option, the chairpersons of the RWIB and CEO must provide a written notice to IWD indicating that both boards have taken appropriate action and desire to pursue this option.
 - ◆ An agreement between the RWIB and a consortium of entities. At a minimum, this should include three (3) or more of the required partners. In order to utilize this option, at a minimum, the RWIB and CEOs must notify all partners that they are willing to consider proposals from mandatory partners, and hold an open meeting to obtain input and finalize the action.
 - ◆ A competitive process. At a minimum, the competitive process to designate the Coordinating Service Provider must include the following:
 - 1) Public Notice: A public notice must be published in one of the official county newspapers, as designated by the county board of supervisors. The public notice must indicate that the RWIB and CEOs will be holding a joint meeting to select the Coordinating Service Provider(s) for the Region. The notice must list the criteria that will be used in the selection of the Coordinating Service Provider(s). The notice must also require that written proposals be submitted by a specific date, and should invite interested entities to give presentations and answer questions relating to the selection criteria listed below at the joint public meeting. Notices must also be mailed to potentially interested entities within the local region.

- 2) Public Meeting: Since the RWIB And the CEO board must agree on the designation of the CSP, at a minimum, the RWIB and CEO must conduct a public meeting to review the written proposals received, obtain any additional information from entities submitting written proposals, and reach an agreement as to the selection(s).
 - 3) Criteria for Selecting Coordinating Service Provider: The following criteria are suggested to be considered and addressed in the selection of a Coordinating Service Provider:
 - ❑ The effectiveness of the agency or organization in delivering comparable or related services is based on documentation of: performance achievement and service level requirements; previous audit and monitoring reports; and capability of the agency's fiscal unit to manage a similar type of program or project;
 - ❑ The likelihood of meeting program goals based upon factors such as past performance, staff commitment, and availability and location of staff;
 - ❑ The effectiveness of the agency or organization in minimizing the duplication of services, while at the same time maximizing the coordination with other agencies and organizations to provide the highest quality activities and services to the participants in the programs; and
 - ❑ Other criteria as determined by the RWIB and CEO.
- b. Adult and Dislocated Worker Service Provider: To designate an Adult and/or Dislocated Worker program service provider, the RWIB may use the following procedure, or may develop a more formal procurement procedure.
- 1) Public Notice: A public notice must be published in the official county newspaper, as designated by the county board of supervisors. The public notice must indicate that the RWIB will hold a meeting to select the Service Provider(s) to provide core and intensive services for the Adult and Dislocated Worker programs under Title I of the Workforce Investment Act. The notice must list the criteria that will be used in the selection of the Service Provider(s), and must also invite interested entities to give presentations and answer questions relating to the selection criteria listed below. Notices should also be mailed to potentially interested entities with the local region.
 - 2) Public Meeting: The RWIB must conduct a public meeting to obtain information from entities interested in providing core and intensive services in the local region and to reach an agreement as to the selection of the service Provider(s).

- 3) Criteria for Selecting Service Providers: The following are examples of criteria that could be considered and addressed in the selection of a Service Provider for Adults and Dislocated Workers.
- ❑ The effectiveness of the agency or organization in delivering comparable or related services based on documentation of: achievement of performance and service level requirements, previous audit and monitoring reports and capability of the agency's fiscal unit to manage a similar type of program or project;
 - ❑ The likelihood of meeting program goals based upon factors such as past performance, staff commitment, and availability and location of staff;
 - ❑ The effectiveness of the agency or organization in minimizing the duplication of services, while at the same time maximizing the coordination with other agencies and organizations to provide the highest quality activities and services to the participants in the programs; and
 - ❑ Other criteria as determined by the RWIB and CEO.
- c. Youth Services Service Provider: Youth Service Providers must be selected through a formal competitive process, and be based on recommendations of the Youth Advisory Council. Such recommendations must be provided to the RWIB prior to the review of proposals and presentations that occur at the public meeting conducted by the board to make this selection.

To designate Youth Service Providers, the RWIB must at a minimum provide:

- 1) Public Notice: A public notice must be published in the official county newspaper, as designated by the county board of supervisors. The public notice must indicate that the RWIB will hold a meeting to select a Youth Service Provider to coordinate the operation of the Youth Program, and to provide eligibility, enrollment, objective assessment and individual service strategy for youth. The notice must list the criteria to be used in the selection of the Youth Service Provider(s) and must require that written proposals be submitted by a specific date. The notice must also invite interested entities that have submitted written proposals to give presentations and answer questions relating to the selection criteria at the public meeting. Notices must also be mailed to potentially interested entities with the local region.
- 2) Public Meeting: The RWIB must conduct a public meeting to review the written proposals received, to obtain any additional information from entities submitting written proposals, and reach an agreement as to the selection(s).

- 3) Criteria for Selecting Youth Service Providers: The following are examples of criteria that could be considered and addressed in the selection of a Service Provider.
 - ❑ The effectiveness of the agency or organization in delivering comparable or related services based on documentation of: achievement of performance and service level requirements, previous audit and monitoring reports and capability of the agency's fiscal unit to manage a similar type of program or project;
 - ❑ The likelihood of meeting program goals based upon factors such as past performance, staff commitment, and availability and location of staff;
 - ❑ The effectiveness of the agency or organization in minimizing the duplication of services, while at the same time maximizing the coordination with other agencies and organizations to provide the highest quality activities and services to the participants in the program.
 - ❑ Other criteria as determined by the RWIB.
2. Memorandum of Understanding (MOU) Impasse Resolution: It is a legal obligation for the RWIB, CEO and Partners to engage in good faith negotiation and reach agreement on the MOU. The Partners, the RWIB and the CEOs may seek the assistance of Iowa Workforce Development or other appropriate state agencies in negotiating the MOUs. After exhausting all alternatives, IWD or the other state agencies may consult with the appropriate federal agencies to address impasse situations.
3. In-house Program Operations by RWIBs: Local boards in Iowa are not incorporated, and therefore do not have the capacity to operate WIA programs in-house.
4. On-the-Job (OJT) and Customized Training Performance Information: Prior to re-contracting with an OJT employer, the past performance of that employer must be reviewed. An OJT contract must not be entered into with an employer who has previously exhibited a pattern of failing to provide OJT participants with continued long-term employment as regular employees, or with wages, benefits and working conditions at the same level and to the same extent as similarly situated employees. OJT participants that voluntarily quit, or are terminated for cause, or are released due to unforeseeable changes in business conditions, need not result in termination of employer eligibility for future OJT contracts.

An employer that has been excluded from OJT contracting because of the requirement described above may again be considered for an OJT placement one year after that sanction was imposed. In this re-contracting situation, if the employer fails to retain the participant after the OJT ends, and there is no apparent cause for dismissing the employee, the employer must not receive any future OJT contracts.

5. Reallocation Policies: The State of Iowa has established local-level reallocation procedures for WIA funds that mirror the policies provided in the statute for state-level reallocation. In this case, if a local area has failed to expend all carry-in funds and to obligate at least 80 percent of the new funds available within a program year, the amount of funds under the 80 percent level is subject to recapture by the state and reallocation. Funds that are not expended by the end of the fiscal year following the year in which the funds were initially allocated are also subject to recapture.
6. Transfer of Funds: The Workforce Investment Act and implementing regulations allow for the transfer of not more than 20 percent of the funds allocated to the region(s) for each program year between the Adult and Dislocated Worker programs, if the Governor approves the transfer. The 2003 appropriation enacted by Congress raised these transfer limits to 30 percent, effective with the Program Year 2003 funds. The following process must be followed to request a transfer of funds between the Adult program and the Dislocated Worker Program.
 - ◆ The RWIB and CEO Board chairs must submit a signed request to the Iowa Workforce Development Adult and Dislocated Worker Program Coordinator requesting the transfer.
 - ◆ The request must provide the rationale for the requested transfer.
 - ◆ The request must identify the amount of funds to be transferred, the program from which the funds will be transferred, and the program to which the funds will be transferred.
 - ◆ All requests must be received by IWD by the end of the third quarter of the program year (March 31) for which the request is being submitted.
 - ◆ IWD will approve or deny the request within 30-days of receipt and provide a written confirmation to the RWIB and CEO chairs. IWD will initiate a contract modification to transfer the funds.

In order to be afforded maximum flexibility to respond to the needs of workers and job seekers, Iowa is requesting a waiver to allow the transfer of 100% of funds between the Adult and Dislocated Worker funding streams. Such a waiver will allow regional boards to respond to specific needs in their areas that may be created by significant numbers of worker dislocations, changes in the local economic environment, intent to increase services to specific populations, or similar issues.

7. Service to Targeted Populations: Iowa Workforce Development will continue to consult with state and local interests to strengthen policy to enhance the Universal Access of programs and services for all Iowans. It is the long-range objective that service design will allow services to be easily accessible to all.

Iowa Workforce Development, consistent with its response to the Olmstead decision, consults and plans with advocacy and other service organizations to support its review of barriers within policy that have a negative impact on non-traditional or under-employed populations of Iowans. Iowa Workforce Development also reviews

focus group and customer satisfaction information specific to these customers to assist in determining if policy has an impact on service delivery for these Iowans. As barriers resulting from the implementation of policy are identified, staff from the Workforce Center Division work with the Director's office to change policy.

Where service needs for a specific population are or become recognized as separate or different from other customers, the agency works to expand relationships with services that are or can become available through the One-Stop Workforce Center system. This is not a matter of policy, specific to separate populations, because policy for this agency continues to reflect a standard of universal access.

8. Establishment of Additional Eligibility Factors for Youth: The sixth youth eligibility criterion is delegated to the determination of local boards.

IX. SERVICE DELIVERY

A. One-Stop Service Delivery Coordination Strategies

The State Board and Iowa Workforce Development provided program goals, policies, and multiple service strategies to the regional boards and service providers in an effort to produce a comprehensive, coordinated, and customer-focused One-Stop System in Iowa. This guidance has been further supported through state resources that maintain the system and by a variety of seminars, training opportunities, on-going technical assistance, and monitoring reviews.

A comprehensive and coordinated One-Stop System is supported in Iowa by the following strategies:

- ◆ Local planning requirements that include a comprehensive analysis of the workforce needs of each region, strategies to address those needs, and an MOU that defines the context of a seamless delivery of services by partners in the local One-Stop Center.
- ◆ Policies that encourage the integration of multiple programs that serve dislocated workers, including the WIA formula and National Emergency Grant funds, the Trade Adjustment Act, the Re-Employment Services funds, State Early Intervention grants, and the Iowa Advantage program.
- ◆ Inter-agency collaboration efforts and program policies that support a comprehensive youth development concept, and effective use of all youth resources.
- ◆ A statewide information tracking system that enables oversight boards and program managers to make data-driven decisions to improve services.
- ◆ Comprehensive WIA and Wagner-Peyser Operations Handbooks that support consistent policy direction and guidance.
- ◆ A Field Information Memo series to provide a formal communications system for state policies, initiatives, and program guidance.
- ◆ Establishment of local Employer's Councils of Iowa in each workforce area to ensure increased levels of business input into the workforce system.
- ◆ Identification of Business Service representatives in each region to conduct outreach and services for the business community.
- ◆ Establishment of Resource Rooms in Iowa Workforce Development offices to support and encourage self-service by program participants, and to expand the information and services available to them.

Beyond those policies, procedures, and activities, the State Board believes that the system can be improved through the establishment of a certification process for One-Stop Centers during this planning cycle. The process will formalize and enhance current state policies and will address coordination among local partners and the seamless delivery of services. Minimum service delivery requirements for One-Stop Centers and affiliated customer access points will also be determined.

B. Workforce Information

The availability of accurate and up-to-date workforce information is essential to effective operation of the workforce investment system. In order to meet the demand for specialized labor market information, IWD staff has been actively involved in national work groups to develop new research projects/programs. These work groups include Wage Record research, Benefit Survey and the Job Vacancy Survey. At the state level, Iowa Workforce Development is an affiliate of the state data center.

Iowa Workforce Development is the contract lead for a national Employer Database used by other state employment agencies for labor exchange purposes. This database provides the most current employer information for the purposes of career exploration, job search, job development, employment support services, enhancing existing employer name and address files, public workforce system development efforts and generating mailing lists to be used for these purposes.

In addition, IWD has joined an effort sponsored by the Census Bureau to produce data called Local Employment Dynamics (LED). These data produce quarterly workforce indicators including: total employment, net job flows, job creation, new hires, separations, industry turnover, average monthly earnings and average monthly new hire earnings. This partnership provides the state with data that was not available previously.

1. Integrating Workforce Information into Planning: The State Board has a close relationship with Iowa Workforce Development's workforce information staff and is quite involved with its products and services. Some aspect of workforce information is on the State Board's agenda at almost every one of its meetings. The Board has created a standing committee to work with staff on products and services to key customer groups as a result of its recent strategic planning efforts. These activities assist the board in making its decisions and also provide the workforce information unit with valuable advice concerning its products and services.

The workforce information staff members provide customized packages of information to assist local boards with their formal planning efforts whenever updated plans become due. At more frequent intervals, workforce information staff members meet personally with local boards and One-Stop staff on a variety of topics. Workforce information staff members periodically introduce local boards and One-Stop staff to new products and services; consult with them about improving existing services; and discuss the potential for introducing new services.

About a year ago, the workforce information unit contracted with one of Iowa's state universities to survey key customer groups, including One-Stop Center staff and economic development professionals, to gauge their satisfaction with existing products and services and to gather input for improvements and new services. The results have been quite positive, and have provided a framework for long-term efforts to further develop workforce information strategies.

Iowa Workforce Development's workforce information unit provides certain services on a fee basis for local groups. These include the Laborshed labor availability studies that are extremely popular with economic development officials, and the newest

product - regional industry studies - that are currently being rolled out. The workforce information unit always works closely with local One-Stop officials in presenting the results of these studies and offering follow-up services to help cement the One-Stop center's relationship with the economic development community.

Since the degree to which workforce information is integrated into the system depends largely on how well the professional staff using the system understand the information and how it can be useful, training is an important issue. Iowa Workforce Development uses some of its Core Products and Services funds to contract with a community college for the services of one trainer who provides training to One-Stop staff, board members, educators and other groups on a full-time basis. This training is very well received, and demand far exceeds the trainer's availability. Iowa Workforce Development's workforce information staff is currently working with the contractor on curricula that staff can use to expand training opportunities.

Of course, the effectiveness of these integration efforts depends in part on the manner in which the workforce information is disseminated, which is described in the following item.

2. Information Dissemination: Iowa disseminates its workforce information with other aspects of the workforce development system in a number of ways. Some methods reach all segments of the system, while others are specifically targeted to certain groups. Approaches include:
 - ◆ Training in the availability and use of workforce information to One-Stop staff, educators, economic developers, workforce boards, and other groups
 - ◆ Presentations to students, educators, economic developers, legislators, and many others groups.
 - ◆ Responses to ad hoc inquiries from policy makers, counselors, economic developers, researchers, educators, students, parents, and others. A large minority of such requests is received from broadcast and print journalists.
 - ◆ Publications prepared on a variety of topics. These range from customized information packages for workforce boards and economic development groups to plan their local activities, to job outlooks for students and job seekers, prevailing wage information for businesses and labor organizations, and labor availability reports for economic developers. Publications are often provided in printed form when the venue demands it, but virtually all publications are also available on Iowa Workforce Development's website.
 - ◆ The Iowa Workforce Information Network (IWIN) is Iowa Workforce Development's interactive Web tool for workforce information. It provides information in spreadsheet format for those who want to see (or download) the details and can generate charts on the fly as well for those who prefer to view information in graphical form. IWIN has been "live" on the agency's website for several years and has just undergone a major overhaul to make it user friendly and more reliable in handling the large quantity of Web traffic it

needs to handle. The revised version of IWIN includes a greater capacity to provide information in the form of articles that can provide narrative analysis of information in addition to the data itself. This is fast becoming the primary tool for remote users to obtain up-to-date workforce information easily for most uses including career counseling, business needs, workforce planning, research, and others.

- ◆ The workforce information website provides other Internet resources as well. One example, among many: when Iowa's State Economist retired a few years ago, the workforce information unit assumed responsibility for the state's Economic Trends resource on the Web. This provides quick up-to-date snapshots of a large variety of economic indicators used by economists, businesses, journalists and others.
- ◆ All of these resources are available in the Resource Centers that are provided to the public as a standard part of each of Iowa's One-Stop Centers.

3. Alignment of Core Products and Services with the WIA State Plan: Iowa's workforce information core products and services are entirely aligned with the WIA State Plan, and both are aligned with the Governor and Lt. Governor's Leadership Agenda. The State Workforce Board and other workforce development officials share the conviction that good policy must be based on good information. The priorities for the workforce system are:

- ◆ Increase the size of the skilled workforce;
- ◆ Increase Iowans' earned income; and
- ◆ Grow the targeted industries and needed workforce skills.

As noted above, state and local policy makers, program planners, vocational educators and others are routinely provided with workforce information designed to assist them with their planning and operations. This information gives them a clearer picture of their local economies and the needs and opportunities that exist.

Workforce information provides the basis for students and job seekers, and the counselors who advise them, to make sound career decisions. It provides information about growth occupations, wage rates, required skill preparation, and many other factors necessary for success in the labor market. Staff members and customers of the One-Stop Centers routinely rely on the workforce information provided through publications, the One-Stop resource centers, and the Internet.

Workforce information provides people on both the supply and demand sides of the labor market with information to increase earned income. Individuals can increase their earned income through the paths of opportunity that workforce information can reveal, and economic developers and policy makers use workforce information to discern where investments can best be targeted to increase Iowans' standard of living. Several major studies conducted over the past decade to help target economic development resources have relied heavily on information produced and disseminated

by Iowa Workforce Development, and the agency also provides products and services directly to local economic development groups to help them operate more effectively.

The workforce information core products and services are also used to make the connection between targeted industries and high growth industries with occupational projections within those industries as well as the skills required by these occupations.

4. Coordinating State and National Tools: The primary method by which Iowa's workforce information products are coordinated with national electronic tools is through the Internet. Iowa Workforce Development, as the agency charged by state law with the lead role in the workforce development system, maintains a comprehensive suite of Web sites geared to different customers such as job seekers, students, businesses and employers. The agency also maintains Web sites for each of the workforce investment regions in Iowa.

The nature of the Internet as a network allows content to be organized in multiple ways at the same time. Thus, for example, connections to America's Career Information network and Career Voyages can be found as resources within the workforce information section of the agency's Web site for those who choose that route to find information. Youth who elect instead to use the portion of the site organized for students will find links to Career Voyages there, as well.

In addition to the multiple context-appropriate links on Iowa's workforce development Web sites, the workforce information unit coordinates with the national electronic tools by including them in presentations, training sessions, and related materials conducted on an ongoing basis.

C. Adult and Dislocated Worker Services

1. Core Services: The basic level of service provided to adults and dislocated workers are called core services.
 - a. Strategy: Iowa's strategy to ensure that adults and dislocated workers have universal access to the minimum required core services is a mandate that all One-Stop operators will provide core services. Such services are available through multiple points of access, including the One-Stop Centers, partner agency locations, service providers, and the Internet.
 - b. Three Tiers of Core Services: Core services are designated as either self-service and informational, facilitated self-help, or staff-assisted.
 - 1) Self-Service and Informational Core Services

The following types of activities and services are considered self-service or informational core services:

 - ◆ Outreach, intake (which may include worker profiling) and orientation to the information and other services available through the system;

- ◆ Self-directed job match and job search assistance;
- ◆ Provision of employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including:
 - Job vacancy listings in such labor market areas;
 - Information on job skills necessary to obtain the jobs listed; and
 - Information relating to local occupations in demand and the earnings and skill requirements for such occupations.
- ◆ Provision of performance and program cost information on eligible providers of training services;
- ◆ Provision of information regarding how the local area is performing on the local performance measures and any additional information with respect to the Workforce Development Center System in the local region;
- ◆ Provision of accurate information relating to the availability of supportive services, including childcare and transportation available in the local region, and referral to such services as appropriate;
- ◆ Consumer reports information and delivery system performance information;
- ◆ Information on other Workforce Development Center System partner services and support services;
- ◆ Provision of information regarding filing claims for unemployment compensation; and
- ◆ Internet browsing (job information and training searches).

2) Facilitated Self-Help Core Services

- ◆ Determination of eligibility to receive services under WIA;
- ◆ Initial assessment of skill levels, aptitudes, abilities, and supportive service needs;
- ◆ Assistance in establishing eligibility for programs of financial aid for assistance for training and education programs; and
- ◆ Resource room usage.

3) Staff-Assisted Core Services

The following types of activities and services are considered staff-assisted core services:

- ◆ Staff-assisted job search and placement assistance, including career counseling;
- ◆ Screened job referrals, such as testing and background checks;

- ◆ Staff assisted job development working with an employer and job seeker; and
- ◆ Staff assisted workshops and job clubs.

c.

Core services provide the foundation of all employment and training activities in each region. The WIA statute requires all adult and dislocated workers to receive such services, and core services are the primary method of job seeker support under the Wagner-Peyser Act. In addition, Iowa Workforce Development receives a state general fund allocation to expand the delivery of such services throughout the state.

It is the responsibility of the RWIB and local partners to determine how such services are delivered in each region. As a part of their local planning, partners are encouraged to consider how to maximize resources and capitalize on the strengths and statutory requirements of each partner. In this way, duplication of services may be avoided, and a seamless delivery system for job seekers is established. Since the Wagner-Peyser activities provided through the Iowa Workforce Development partners are mandated as core services, it is expected that this IWD function provides a foundation for service to all adults and dislocated workers, which may be supplemented and enhanced by services provided through other One-Stop partners. WIA providers, as the primary deliverers of training services in each region, are encouraged to focus their limited resources on training activities, thus maximizing the number of job seekers who may improve their work skills to obtain higher skill, high demand occupations.

2. Intensive Services for Adults and Dislocated Workers.

The state has mandated all WIA service providers to provide Intensive Services to those eligible adult and dislocated workers who meet all eligibility requirements and are in need of such services. The following types of activities and services are considered Intensive Services:

- ◆ Comprehensive and specialized assessments of skill levels and service needs, including diagnostic testing and use of other assessment tools, and in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals;
- ◆ Development of an individual employment plan, to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve the employment goals;
- ◆ Case management for participants seeking training services;
- ◆ Skill upgrading is a short-term prevocational service; including development of learning skills, communication skills, interviewing skills, punctuality,

personal maintenance skills, and professional conduct, to prepare individuals for unsubsidized employment or training;

- ◆ Out-of-area job search and relocation support;
- ◆ Internships; and
- ◆ Work experience.

3. Training Services for Adults and Dislocated Workers: The following types of activities and services are considered training services:

- ◆ Occupational skills training, including training for nontraditional employment;
- ◆ Programs that combine workplace training with related instruction, which may include cooperative education programs;
- ◆ Training programs operated by the private sector;
- ◆ Retraining;
- ◆ Entrepreneurial training;
- ◆ Customized training; and
- ◆ Adult education and literacy activities that are provided in combination with other allowable training services.

- a. Governor's Vision to Increase Training Access: As already noted several times in this document, a major part of the Governor's agenda to promote workforce and the economy in Iowa is to increase workers' skills and, in particular, skills for targeted industries and occupations. To achieve these goals, it is incumbent on the workforce system to provide access to training opportunities that address those skill needs.

Multiple initiatives are in place or planned to increase those opportunities. The state provides a number of options for businesses to provide training to incumbent workers or new workers needed for business expansions. The employment and training system will continue to use the state's network of community colleges as a foundation for worker training options. Those colleges are continuously improving the options available for training, including expanding course offerings in demand occupations and using technology and the Internet for training accessibility. Within the One-Stop System, additional funds to support training from WIA and partner programs may be made available as Iowa Workforce Development and its Wagner-Peyser programs assume more responsibility for the delivery of core services.

- b. Individual Training Accounts: The Individual Training Account (ITA) is the mechanism through which WIA funds are used to make payment for the purchase of training services from eligible training providers for Adults and Dislocated Workers. The ITA provides participants with the opportunity to select training providers from the list of eligible providers maintained by the

state. This maximizes participant choice yet allows consultation from the participant's case manager.

Iowa's policy allows the local regions to set their own limits on ITA's dollar amounts and duration. Payment amounts and the duration of an Individual Training Account may be limited according to the needs identified in the individual's employment plan and specified in the region's local plan.

Unless the program has exhausted or has insufficient funds to cover the estimated cost of the program, the Adult or Dislocated Worker service provider must refer the individual to the selected training provider. Since funds allocated to a region for training activities are limited, priority is given to recipients of public assistance and other low-income individuals.

In order to get training opportunities, the members of the Regional Workforce Investment Boards, who represent business, labor, education, and economic development, are actively involved in strategic planning to develop innovative training strategies to address skill gaps in the regions. These strategies are identified in Regional Customer Service Plan. The plan includes an identification of the workforce needs of businesses, jobseekers and workers in the region. Current and projected employment opportunities and the job skills necessary to obtain these positions are identified.

Regions use economic development and labor market information, regional surveys and input from business and industry to determine high-growth, high-demand occupations in the area. When determining the appropriate mix of activities and services for a participant, occupationally specific training may only be conducted for occupations that are in demand in the area served, or in another area if the participant is willing to relocate.

State policies permit the use of WIA Title I funds for the provision of training through apprenticeship programs and for financial assistance to employ or train participants in religious activities.

- c. Eligible Training Provider List: Iowa Workforce Development maintains a list of approved training providers and approved programs on the IWD website. The list is updated as needed and is made available to participants in employment and training activities and others through the Workforce Development Center system. In addition, each regional workforce investment board maintains a list of all approved training providers, including providers for on-the-job and customized training in the region.

The workforce investment board has the responsibility of notifying all known providers of training in their region regarding the process and timeline for accepting applications. IWD may approve and certify training providers from other neighboring states when requested.

- d. OJT and Customized Training: On-the-Job (OJT) and Customized Training activities are promoted at multiple levels with the state. At the state level, both Iowa Workforce Development and the Department of Economic Development have programs and initiatives focused on these activities. In general, the IWD programs are primarily directed toward expanding the skills of individual job seekers through the WIA and partner service providers. The Department of Economic Development works with businesses that are expanding or relocating to the state, and uses OJT and customized training programs as incentives for such growth. Both departments market and promote these opportunities to businesses and job seekers, and work closely together to coordinate, rather than duplicate such services. As noted earlier, targeted business sectors and occupations are particularly emphasized. The community college system is also an essential partner in this process, especially as training programs and curricula are customized to specific business needs.

At the regional level, the RWIB, CEO and WIA Adult and Dislocated Worker service providers partner with business, economic development and education to increase the number of OJT and Customized Training opportunities available in the region. The local plan and its assessment of workplace needs in each region are essential to these activities, especially because training resources are limited. Since the WIA statute limits the opportunity to provide incumbent worker training at the regional level with formula allocated funds, state policies provide for such training to be provided with the incentive funds that are awarded from the state set-aside.

4. Service to Specific Populations

- a. Employment and Training Services Accessibility: Iowa Workforce Development, related programs and partner agencies are seeking to establish universal accessibility to services and products for all Iowans. It is a long-range objective that service design will allow services to be easily accessible without accommodation. Targeted populations include: • dislocated workers; • displaced homemakers; • low-income individuals; • migrants and seasonal farm workers; • women; • minorities; • individuals training for non-traditional employment; • veterans; • public assistance recipients; and • individuals with multiple barriers to employment, including older individuals, people with limited English-speaking proficiency, and people with disabilities.

Intermediary steps to bring the service design to the point of universal access include:

- ◆ Developing collaborative relationships with Iowa services and programs that have customers sharing challenges of welfare-dependency, culture differences, language difficulties, stigma, and disability to support long-range planning and design of universally accessible services.

- ◆ Providing opportunities to expand the capacity of existing services to include customers perceived to have multiple barriers to successful outcomes. Such activities include: • staff training; • addition of resources to workforce centers with added expertise in areas of “non-traditional” customers through employment or partnership; and • research with challenged populations to learn their perceptions of the service system to facilitate effective planning in the future.

Examples of the above strategies include: • the development of new Iowan Centers in Iowa designed to more fully engage “new Iowans” in the economy of their community; • participation on collaborative state planning to address homelessness through representation on the Iowa Council on Homelessness; • collaborative planning to enhance outcomes for older workers through the Older Worker Planning Council; • participation with other state agencies and organizations in grant activities designed to improve access and service inclusion for job seekers with disabilities (including the recent addition of disability program navigators assigned to all Iowa workforce regions); and • participation in a multi-state agency group dedicated to improving the way services share resources, customers and information for the benefit of the job seeker.

- ◆ Using disability program navigators to serve as resources to Iowa Workforce Development’s EO officer in its plan to address areas covered in Section 188 of the Workforce Investment Act. Also, Iowa Workforce Development has responded to the Iowa Governor’s direction to develop a plan to address potential barriers in access to services by Iowans with disabilities in response to the Olmstead decision, and includes many of these activities in its plan.
- ◆ Focusing on the development of improved availability of customer information through the Internet, as well as service access.
- ◆ Working with local partner agencies to develop plans to promote use of Iowa’s “One-Stop” products and services for use by our targeted populations.
- ◆ Creating of a Targeted Services Bureau within IWD’s Workforce Center Administration Division with staff dedicated to the effective service delivery through the service system to those individuals who have not traditionally been served successfully through the labor exchange system.

- b. Re-employment and Worker Profiling Services: The state has adopted specific policies and procedures to provide enhanced services to individuals receiving unemployment insurance and who are identified as likely to exhaust those benefits.

UI claimants likely to exhaust benefits are identified by an automated formula; lists of claimants eligible for Worker Profiling and Reemployment Services are transmitted electronically to Workforce Development Centers.

When a profiled class is determined, referrals are made to local IWD Workforce Centers for a joint staff orientation. Selected claimants are contacted and scheduled for orientation services. If re-employment training is needed, the claimant is referred to WIA Adult services for intensive or training services.

The orientation explains re-employment services available to the claimant and includes the following functions:

- 1) Explains the re-employment services available to the claimant in their geographical area.
- 2) Determines if the claimant has received previous re-employment services and whether additional participation will be received to meet continued UI eligibility for benefits.
- 3) Identifies claimants that may have been referred in error; i.e. union members with access to a hiring hall; or claimant with a definite recall date with their previous employer.
- 4) Advise claimants that continued eligibility for UI benefits is contingent upon the claimant's participation in re-employment services.
- 5) Prepares an individual re-employment plan. An intake assessment is conducted and needed services are identified. An individualized re-employment service plan is then prepared, in consultation with the claimant. The service plan lists progressive services for which claimant participation is required. The agreed-upon service plan is signed by both parties to reinforce its contents and importance.
- 6) Employment service staff provides UI staff the attendance information and results of orientation and assessment. This is done so issues that require unemployment insurance benefit eligibility may be addressed and a decision can be made for justifiable cause not to participate in reemployment services.

Based on information gained during the orientation process, claimants that have the necessary skills, knowledge, and abilities required to fill current job openings listed with Workforce Development staff are referred to employers.

Claimants that refuse referrals or refuse job offers made by the employer are scheduled for a fact-finding interview to adjudicate a job refusal issue.

Claimants who are not referred to job openings are required to participate in a re-employment component such as job search assistance workshops. These workshops will be in modules in order for the claimant to participate in only those workshops determined to be necessary for them to find employment opportunities. Workers are offered workshops that will include the following topics: • Initial Assessment; • Labor Market Information; • Career

Inventories; • Career Exploration; • Self-directed Job Search; • Dealing with Job Loss; • Worker Surveys; • Community Resources and Employment Programs; • Financial Management; • Self-directed Resume Development and Job Application Procedures; • Information on Job Keeping in today's Work Environment; and • Applying for Financial Aid.

- c. Unemployment Insurance Work Test and Feedback: As a function of applying for unemployment insurance, each claimant is automatically registered for job placement services. However, claimants that are no longer attached to an employer are profiled based on certain characteristics and included in a pool to be scheduled for re-employment services. The characteristics include their last occupation, industry, education, and duration of employment at their last employer. Local staff schedules claimants that that are paid their first week of UI benefits in the first five weeks of their claim, and provided the services described in section “b” above.

Claimants that refuse to participate in re-employment services, fail to report, or refuse an appropriate referral to work are scheduled for a fact finding to adjudicate their continued eligibility for unemployment insurance.

- d. Integrating Rapid Response, Dislocated Worker, and Trade Adjustment Act: State policies, training and technical assistance have consistently promoted the integration of dislocated worker services. Since multiple programs and funding sources are often available in the major dislocation events, it is essential that coordination of these resources occur to the benefit of those workers. To that end, the state promotes the co-enrollment of participants in the WIA and TAA programs, and the establishment of joint employability plans. Rapid Response activities are also coordinated between the programs when there is the likelihood that a TAA petition will be approved due to the impact of foreign competition on the dislocation. In such situations, state grants to provide Early Intervention activities for the workers may be supplemented by state grants called Special Intervention Funds. These resources are directed and designed to improve data collection and assessment activities in order to more effectively design services.

In July of 2004, Iowa Workforce Development provided a training session to providers of dislocated worker services to promote and guide the coordination of such services. Participants in this session included staff involved in WIA formula and discretionary programs, the Trade Adjustment Act, Re-Employment Services, and Wagner-Peyser programs.

- e. Overcoming Barriers to Skill Achievement for Special Populations: IWD's Targeted Service Bureau works with collaborating state agencies to implement the following strategies to overcome barriers to skill achievement and employment:

- ◆ Enhance the ability of Iowa's labor exchange system to effectively serve all Iowans.
 - ◆ Identify information and tools that are available to businesses to support them in effectively employing Iowans in targeted populations.
 - ◆ Coordinate business development activities with IWD's business services team, and the business service staff of our partner agencies to promote the use of these products and tools, and to ensure that business continues to see Iowa's One-Stop Workforce Center System as an ongoing resource to them in employing "non-traditional" employees.
 - ◆ The Targeted Services Bureau currently participates on multi-agency planning teams designed to increase business direction for the employment activities for workers that have disabilities and older workers. Similar planning is under development in regard to our other targeted populations.
- f. Availability/Accessibility of One-Stop Services for individuals with Disabilities: Iowa Workforce Development is working collaboratively with other state and local agencies on a long-term objective to design products and services that are universally accessible so that needs for accommodation will be kept at a minimum. Strategies to support planning that will facilitate progress in this area include:
- ◆ Local focus groups with Iowans with disabilities to generate feedback on service use;
 - ◆ Development of a multi-agency "Assistive Technology Team" or "A-Team" that is available to one-stop partner agencies to review how job seekers access services and develop recommendations to support increased service access;
 - ◆ Regular reviews of use of available assistive technology and recommendations of state partner agencies including Iowa Department for the Blind, Iowa Deaf Services, Iowa Program for Assistive Technology, Iowa Division of Persons with Disabilities, and Iowa Governor's DD Council;
 - ◆ Navigators and local partner agencies engage local resources to review accessibility of services and support the outreach and focus groups with local people with disabilities. Navigators also work with local partners to development staff training and orientation that will enhance their comfort and ability to include people with disabilities in their services; and
 - ◆ Utilization of the direction in Section 188 of WIA, to support the effective development of policy that will support the enhanced use of workforce products and services by people with disabilities. IWD's EO officer oversees the review of state and local application of this direction, and will coordinate with local partners and navigators to facilitate the enhanced understanding of the importance of Section 188 by One-Stop staff.

- g. Role of LVER/DVOP for Services to Veterans: In one-stop centers, veterans will be identified at each point of contact including Internet applications. Those individuals that qualify under Public Law 107-288 of the U.S.C. and wish to be seen by a Local Veteran Employment Representative (LVER) or Disabled Veteran Outreach Program (DVOP), will be seen for assessment of needed services and or referrals. If not seen by the LVER or DVOP, then Wagner-Peyser staff will assist the veteran with core services and referrals as needed. All application materials will be forwarded on to the LVER or DVOP for that region for review for intensive services or need for case management.

Those needing intensive services will be served by a LVER or DVOP. If a veteran needs case management services, that veteran will be assigned to a DVOP to receive intensive services.

The LVER and DVOP staff will serve the role of educators to the One- stop operators, their partners and the Regional Workforce Investment Board members. The LVER and DVOP staff will train and educate on:

- ◆ The identification of veteran under Title 38 of the U.S.C;
- ◆ Criteria for the identification of needs for referral for intensive services; and
- ◆ Veterans' preference requirements and methodologies.

Partner agencies such as WIA, PROMISE JOBS, and Department of Vocational Rehabilitation Services will also identify those veteran customers at their points of contact. Those veteran customers needing employment or intensive services will be referred to a LVER or DVOP for assessment and all application materials will be forwarded on to the LVER or DVOP for that area for review for intensive services or need for case management.

The state will ensure adherence to the legislative requirements for veteran's staff. This includes, but is not limited to, employing only veterans to fill the LVER and DVOP positions with a preference towards hiring disabled veterans. Each of these staff is trained in their new roles and responsibilities under the Jobs for Veterans Act of 2002. The LVER, DVOP, and local Wagner-Peyser management work closely with all partners to ensure the mandatory WIA partners provide veteran's preference.

- h. Services for Limited English Proficient Persons: The New Iowan Centers continue to provide services to minorities and individuals with multiple barriers, especially those with limited English-speaking proficiency. The atmosphere in the centers is welcoming to all minorities in part because staff is culturally sensitive as well as bilingual. Hundreds of people have been assisted with English as a Second Language (ESL) classes and an interactive ESL program has been initiated in all New Iowan Centers. This new

technology is user-friendly, allows the client to work at their own pace, and diminishes accents in speech. The program is also a great tool for individuals preparing to apply for U.S. citizenship.

- i. Services for Migrant Seasonal Farm Workers and Agricultural Employers: Iowa Workforce Development has implemented strategies to ensure accessibility to the full range of employment and training programs and services delivered through the state's One-Stop delivery system to meet the needs of migrant and seasonal farm workers (MSFWs).

An essential part of that strategy is the collaborative partnership that exists between IWD and Proteus, Inc., which operates the National Farmworker Jobs Program in Iowa. Proteus is a partner at both state and local levels, working with IWD's MSFW Outreach program, the New Iowan Centers, and One-Stop Partners in all regions of the state. The Proteus staff provide partner cross training and itinerant service delivery in many of the One-Stop Centers.

The IWD MSFW Outreach program employs four Migrant Seasonal Farm Worker Outreach Specialists, based in Sioux City, Waterloo, Cedar Rapids and Ottumwa. These staff travel to all regions to assist MSFWs by providing information about their labor rights, helping to find temporary employment in the off season, and to find permanent employment and meet any other needs by connecting them with appropriate agencies.

In addition to meeting with the workers, the MSFW Outreach Specialists meet one-on-one with agricultural employers to introduce the MSFW program and provide a network or resource for worker referrals. They also meet with chambers of commerce and other community organizations to help the communities recognize the needs of the MSFWs and their families. Some communities have created diversity committees and others have simply been more welcoming and aware of their new community members.

The number of Migrant and Seasonal Farm Workers (MSFWs) that Iowa anticipates to reach annually for core, intensive, and training services in the One-Stop Career Center System is 1,047.

5. Priority of Service

- a. Intensive and Training Services for Adults: The Act requires that, in the event that funds allocated to a region for Adult employment and training activities are limited, priority for intensive and training services funded with Adult funds must be given to recipients of public assistance and other low-income individuals in the region. Since the Adult Program funds are limited in Iowa, IWD has determined that prioritization is demonstrated if 55 percent of the Adult Program participants are welfare recipients or low-income individuals. An additional 40 percent must have a family income that does not exceed 150 percent of the lower living standard income level. The remaining five-percent must meet the criteria established in the Regional Customer Service Plan. Service providers may serve more than 40 percent of individuals with family income up to 150 percent of the LLSIL if a waiver was applied for in the Regional Customer Service Plan, and the waiver was approved.
- b. Priority for Veterans: The state has invited the Iowa Director for Veterans Employment and Training (DVET) to address local management for the programs affected by the Jobs for Veterans Act of 2002 to help described expectations for providing priority of service to veterans. The state has followed-up by requiring that each SWA describe in their local customer service plan how they will ensure veterans preference is provided in their programs. LVER and DVOP staff will consult with local partners on how to implement veteran's preference, and will be monitoring compliance with the established procedure.

Priority of service is provided to veteran job seekers accessing core services through the Wagner-Peyser program. This is assured through Iowa's annual veteran service plan. This is extended to preference in scheduling for workshops, job orders, and case management.

As the states have been provided minimal guidance for implementing priority of service to veterans in the WIA adult and dislocated worker programs, Iowa will take advantage of this planning cycle to develop minimum standards. Each region has been asked to submit their plan for providing priority of service to veterans. Each plan will be scrutinized by the state liaisons to the local WIB. The state liaisons will work with the DVET to develop expectations that can be enforced locally. The state veteran program administrator will monitor progress through annual monitoring visits and report those findings to the DVET.

D. Rapid Response Services

Rapid Response activities occur in the event of a plant closing or major layoff. The goal of rapid response is to quickly engage workers in dealing with their job loss and to begin unemployment activities. Rapid response activities are supported through funds set aside from the dislocated worker-funding stream. A Program Coordinator in the IWD Division of Workforce Center

Administration is assigned the responsibility as Rapid Response Coordinator. This individual is responsible for disseminating information upon receipt of a Worker Adjustment and Retraining Notification Act (WARN) notice. Local One-Stop operators are immediately informed upon receipt of a WARN notice.

Initiation of a Rapid Response action to a plant closing or mass layoff includes the following activities: • contact with company and labor officials from the affected business; • contact with all service providing agencies in the local area; • contact with all One-Stop partners; • arrangement and facilitation of Rapid Response meetings; and • arrangement and facilitation of employee information meetings.

Upon notice of a major worker dislocation, company officials are contacted immediately to discuss early intervention services. Officials of the affected business are encouraged to allow onsite services. In such situations, companies often experience an immediate reduction in absenteeism, an increase in productivity, and improvement in employee moral. Given these responses, discussions regarding providing services on company time are initiated and business officials often agree to this suggestion.

Rapid Response services include: • conducting surveys to determine employee needs; • providing core services from the local One-Stop; • scheduling on-site informational workshops; • developing short-term skills upgrading classes based upon needs assessments; • assisting affected employees with individualized barrier assessments and skills deficiencies; and • encouragement of all labor exchange activities. Services provided are based upon local labor market conditions, evaluation of worker surveys, the skill level to include transferable skills of the workforce, the general economic condition of the area, the availability of meaningful training, and the motivation of the workforce.

Rapid Response economic development activities include facilitating communications between companies undergoing layoffs with similar companies that are growing and need skilled workers. These communications can be direct between Human Resource Directors/Managers of the involved companies, or it may be necessary to use the state's labor exchange system to ensure appropriate referrals for specific careers by the use of individualized counseling and assessment techniques. Funds are used to sponsor Job Fairs to accommodate both hiring businesses and dislocated workers. Through partnerships with economic development groups, demand skills are determined and training to meet these demands is developed by One-Stop partners or other educational providers such as community colleges.

Rapid Response funds are used to fund Early Intervention Grants or other special projects. Early Intervention Funds are directed locally to provide immediate and comprehensive services to individuals facing dislocation. The award is based upon the size of the event, and all services are documented in the State's system.

Finally, Iowa's Management Information System tracks all activities of National Emergency Grants, State Emergency Grants, and State Early Intervention Grants.

E. Youth Services

The Governor's vision for youth in Iowa is that by developing state policy, forging interagency partnerships, developing common goals and supporting collaboration at the local level, all youth will have increased opportunities to succeed in school and employment. This approach mirrors the ETA's strategic vision for youth services.

Interagency staff from Iowa attended the Youth Forum held in Chicago in 2004 that brought partners together to discuss the common vision of the federal departments of Education, Labor, Juvenile Justice and Human Services. Iowa's conversations focused on how the work of the state-level partners can be carried to the local level and actual practice. The state partners will provide guidance and support to local service providers to have similar conversations and to develop strategies to provide a comprehensive approach to serving youth in the areas of remediation, supporting youth in school and those returning to school, career exploration and work readiness opportunities, completion of high school or GED, and post-secondary training and education.

Iowa and the members of the Iowa Collaboration for Youth Development (ICYD) look forward to working with the Federal Technical Assistance Team to further enhance collaboration in the state. Because ETA's strategic vision parallels the work of the ICYD, the "Team" will be able to assist in rolling out the work of the ICYD to positively impact services to youth in the state.

1. Strategies: Iowa's strategies for providing comprehensive, integrated services to eligible youth will include continued efforts to maintain ongoing contact with partner agencies in order to connect with initiatives that will enhance the workforce development system in serving eligible youth. This will involve ongoing participation in the ICYD at the state level. Knowledge of partner agency operations and initiatives creates a greater understanding of their efforts and provides opportunities for the workforce system to have input in the development of policy and program development that will enhance the workforce system in serving youth most in need. The workforce system in return welcomes support and input in the development of policy and programs by partner agencies that will enhance their partnership at the state and local level in serving youth most in need.

The workforce development systems in Iowa strive to serve as many individuals as possible. In the workforce development system, WIA services have targeted youth most in need and at risk of not succeeding. Because the majority of youth served in WIA and similar services have multiple barriers to success, youth service providers have needed to partner to adequately serve the youth most in need. More comprehensive partnering at the local level, around youth services, will continue to be supported and youth service providers are encouraged to request assistance from state staff to address the needs of youth served creatively.

The ICYD has developed a Result's Framework that is to be adopted by all partner agencies and will be reflected in youth-related policy. The Iowa youth development framework identifies four broad result areas, designed for use across state departments and agencies and at both the state and community levels to guide youth

policy, organize planning activities, and monitor youth development outcomes. It also builds on the results already being used for Iowa's early childhood initiative - Community Empowerment - that identifies result areas for children from birth to age five for the state and communities in Iowa. The Results Framework demonstrates what Iowa hopes all youth will be able to achieve.

IOWA YOUTH DEVELOPMENT FRAMEWORK

Result Area	Components
All Youth have the Benefit of Safe and Supportive Families, Schools and Communities	Economic security; Basic needs (housing, food, etc.); Positive relationships with family members; Safe communities; Safe and effective schools; Quality youth programs and opportunities; Positive connections with adults; Continuum of effective services and interventions.
All Youth are Healthy and Socially Competent	Physical and mental health status; Lifestyle choices (e.g., avoidance of risky behaviors); Personal and social development; Pro-social relations.
All Youth are Successful in School	School attachment; Academic achievement; Commitment to Learning.
All Youth are Prepared for a Productive Adulthood	Vocational and career awareness; Employability skills; Self-sufficiency and Life skills; Civic engagement (voting); Community involvement; and Youth Leadership.

2. Coordination with Job Corps: Iowa has one Job Corps Center in Denison, Iowa, and a proposal has been developed by Indian Hills Community College to build another smaller center in Ottumwa, Iowa. Iowa's workforce system has worked closely with Job Corps and Job Corps is represented across the state in the WIA One-Stops. State staff has provided opportunities for Job Corps center staff to share information with WIA service providers and the relevant agencies have good working relationships. Youth across the state are referred to Job Corps as appropriate by partner agencies and through Job corps recruiters located in One-Stop Centers.

Similar efforts of coordination are made at the state and local levels with other appropriate youth serving entities and programs. The state will continue to encourage and support staff from statewide youth serving initiatives meeting with WIA service provider staff and state staff on an ongoing basis. Several opportunities are available through workshops at the Association of Iowa Workforce Partners' annual conference, quarterly youth service provider meetings, trainings offered by the state and technical assistance as needed and requested.

3. Use of Set-aside Funds: The state has used set-aside funds to support the Governor's vision for serving youth. A major initiative in this effort is the Iowa Jobs for America's Graduates (IJAG) program. The Jobs for America's Graduates program's

goals include preventing youth at risk-of dropping out of high school from dropping out and providing opportunities for youth to enter continuing education, training or employment following high school. The IJAG program has been supported with set-aside funds for several years.

F. Business Services

1. Employer Needs: The state uses a number of mechanisms and partnerships to keep the pulse on the needs of Iowa's business community. A cornerstone for maintaining a business-customer focus workforce development system is the preparation of a Regional Assessment and Analysis by local boards. The information from this process will help the local Workforce Investment Board identify the workforce development needs in its regions, and determine the course of action to meet those needs. The representation of business members on the RWIB helps to ensure this focus and accuracy on the needs analysis. In addition, the Iowa Workforce Development Board will use the information as it updates its Strategic Workforce Development Plan.

Locally, Wagner-Peyser and WIA Adult and Youth staff are engaged in outreach activities to business and to economic development organizations, sharing labor market information and assisting with their recruitment and retention issues. These efforts are complemented by activities of the RWIB and CEOs, and through the community colleges, since many of those institutions are WIA Service Providers, and all of which work closely with the One-Stop partners. It is through this grassroots approach that the workforce system garners its greatest knowledge about the current and future needs of business.

Iowa's Employers' Councils are groups of employers who work in partnership with Iowa Workforce Development to meet the workforce needs of employers. They provide an employer perspective in advising IWD and other policy makers on the full range of workforce issues and topics of concern to employers. There are 20 councils statewide, which provide support and recommendations to the state level ECI. The special role of the state level Employers' Council is to help gather and disseminate information about the activities of local councils, and to represent the local councils at the state and federal levels.

Finally, Iowa Workforce Development is involved in a coordinated effort with the Department of Economic Development and private sector businesses called the Human Resource Recruitment Consortium to attract graduates and former Iowans back to Iowa. The membership of this group is made up entirely of businesses interested in the same goal.

2. Integration of Business Services: As stated earlier, Wagner-Peyser Act funded staff provide the cornerstone for core services in the Iowa One-Stop Center system. Core services to business are no exception. Management for Wagner Peyser staff have been empowered to work with their local partners and boards to ensure that the

delivery of services to business is non-duplicative and focused on the priorities of the local workforce boards.

Specific examples of this activity include working with economic development groups such as the Professional Developers of Iowa and Chambers of Commerce; being involved with community leadership in seeking economic development grants; and directing business service representatives' activities in support of all partner programs.

2. Streamline Federal Tax Credit Programs: Iowa has streamlined administration of the Worker Opportunity Tax Credit (WOTC) program and Federal Bonding programs by centralizing the certification and record keeping at the state level. Local One-Stop staff (primarily state staff) is trained to identify potentially eligible candidates for WOTC and to complete the appropriate documentation. Questions about Federal Bonding are referred directly to a state level staff person that provides direct customer service.

G. Innovative Service Delivery Strategies

The state has initiated a number of innovative service delivery strategies that are intended to improve the employment and training system and the services it provides. All of these initiatives have been described elsewhere in this document. They include the following:

- The Iowa Collaboration for Youth Development (ICYD) is an interagency initiative designed to better align policies and programs and to encourage collaboration among multiple state and community agencies on youth-related issues.
- Employers' Councils of Iowa add a business perspective in advising Iowa Workforce Development. They provide opportunities for businesses to exchange information and develop education programs for businesses.
- New Iowans Centers support workers, businesses, and communities with information and support for Iowa's increasing diverse population.
- The State Board will establish criteria for the certification of One-Stop Centers in order to promote greater consistency and enhance customer services.
- The level of core services provided by Iowa Workforce Development offices to customers provide the latitude for WIA Title I programs to focus their resources on intensive and training services.

H. Faith-based and Community Organizations

The State of Iowa promotes the involvement of community and faith-based organizations in the employment and training system as a means to better engage and serve most-in-need/most-at-risk populations. Since the majority of such activities occur at the regional and local level, the primary focus of this effort is with local boards and service providers. Outreach to community and faith-based groups includes the expansion of referral systems between the One-Stop system and such

organizations, shared grant opportunities for funding provided at federal and state levels, and joint efforts to expand program services, especially for special populations.

X. STATE ADMINISTRATION

A. Infrastructure to Support One-Stop Activities

The State of Iowa, through Iowa Workforce Development, maintains a statewide data collection system for its WIA and Wagner-Peyser programs. Since all service providers use the same system, data collection and reporting is consistently available and up-to-date. This information management system supports improved local management decisions and provides for in-depth statistical analysis at the state level. The result is more integrated service delivery and improved performance achievement.

B. Use of Funds Reserved for Statewide Activities

Through Iowa Workforce Development, the State of Iowa reserves 15% of the funds available in the Adult, Youth and Dislocated Worker programs for administration, system support, incentive awards, and special projects. Of these funds, one-third, or 5% of the overall grants, is reserved for state administration costs. Another third is made available for incentive awards to local areas that successfully achieve performance goals in these programs. The remaining funds are used for a variety of special projects, including:

- ◆ funding of youth programs such as the Iowa's Jobs for America's Graduates (IJAG) program;
- ◆ surveys of labor market areas on workforce availability and workforce skills;
- ◆ staff development and training opportunities;
- ◆ research projects for special populations; and
- ◆ grants for local projects.

An additional 15% of the funds available for Dislocated Worker programs is also reserved. These funds support the:

- ◆ operation of Rapid Response activities that are made available to workers dislocated by plant closings or mass layoffs;
- ◆ Early Intervention Grants that provide immediate services to such workers;
- ◆ delivery of Iowa Advantage workshops to dislocated workers to assist them in handling the impact and effects of their lay-off in order to quickly re-engage them in the workforce; and
- ◆ funding of larger, long-term grants for employment and training services to these workers impacted by plant closings or lay-offs that may not qualify for additional federal funding.

C. Implementing Waivers

Two waivers are requested in this plan: 1) to extend the initial period of eligibility for certified training providers, and 2) to permit the total transfer of funds between the WIA Adult and Dislocated

Worker funding streams. Both of these waivers are designed to increase the availability of training opportunities and training resources for program customers.

D. Performance Management and Accountability

An effective performance management and accountability system depends upon several important factors:

- ◆ Clearly defined performance goals and measures;
- ◆ A data tracking system that provides timely and accurate information, which can be queried or reported in formats that permit close analysis;
- ◆ An on-going evaluation process that not only reviews the current level of performance, but also includes historical and projected performance;
- ◆ Flexible program policies that allow rapid adjustment to issues of economic and workforce impact; and
- ◆ A system of incentive awards and sanctions.

The State of Iowa has these elements in place for performance accountability of the One-Stop System. The primary goals featured in the system are the mandated program goals for WIA and Wagner-Peyser. While some these measures (placement rates and earnings at placement) are elevated to an enterprise-wide or broader system level for purposes of gubernatorial reports or the Results Iowa website, there are no additional state-established goals for the employment and training system. Regional boards also have the option of establishing additional goals for their workforce areas, but have declined to do so. It would appear that the extensive (and sometimes excessive) number of statutory program goals that already exist in the system mitigates any desire to establish additional goals. For this reason, Iowa welcomes the federal initiative to establish only a few common measures that are most representative of system success.

The initial five-year period of WIA operation has seen consistent and constant improvement of performance in Iowa. With few exceptions, both the negotiated performance levels of the seventeen WIA measures and the achievement levels of those measures have steadily increased. This growth can be attributable to improvements and familiarity with the One-Stop operational system, increased understanding of the measures and how enrollment decisions affect them, and training and technical assistance provided by state staff and consultants. The negotiation process that occurs with regional boards to establish local performance standards also places an important focus on the measures and ultimately enhances performance.

The data tracking system in Iowa is extremely valuable to the efforts to improve system performance. Because the state provides a comprehensive tracking system for its programs, the network of One-Stop Centers is supported by coordinated data tracking. The comprehensive reports and query capabilities provided by this system are essential to program analysis at both the state and local levels, leading to data-driven decisions that improve system quality and efficiency.

On-going evaluation and analysis of performance achievement occurs at federal, state and local levels. The ETA Regional Office provides a quarterly assessment of performance and expenditure

levels of the ten states in the region. This information is used for comparative and analytical purposes, and is shared with local service providers. At the state level, regional representatives compile data on each region, to include enrollment levels, expenditure rates, and performance achievement. This information is shared with local boards and service providers. Locally, RWIBs routinely receive and analyze performance and enrollment data as part of their oversight responsibilities.

To further drive performance accountability in the WIA system, Iowa has established incentive and sanction policies. Incentive awards are made to regions that have successfully achieved their negotiated performance levels. Fully one-third of the state set-aside funds are used for this purpose. At the other extreme, sanction policies are in place for regions that fail to achieve acceptable performance. Sanctions may range from the submittal of a corrective action plan to re-designation of the region. A copy of the Incentive and Sanction policies is provided in Attachment 7.

As noted above, the State of Iowa supports the implementation of common measures, and is preparing to initiate changes in its information tracking system for the upcoming program year. These changes are necessary due to new federal reporting requirements that support the common measures policies. Although the extremely short time frame provided by DOL/ETA between notice and implementation of these changes creates system issues, Iowa will be ready to apply these new requirements to the system.

For the next two Program Years, Iowa is proposing the following performance levels. These levels are subject to negotiation with the DOL/ETA, and final standards will be established subsequent to that action.

IOWA - Statewide Performance Goals				
Performance Measure		Negotiated Performance Goal PY 04 (Current)	Proposed Performance Goal PY 05	Proposed Performance Goal PY 06
<u>Adult</u>				
Entered Employment Rate		73%	83%	83%
Retention Rate		83%	85%	86%
Earnings Change		\$3,500	\$3,400	\$3,500
Credential Rate		54%	61%	62%
<u>Dislocated Worker</u>				
Entered Employment Rate		81%	87%	88%
Retention Rate		89%	90%	91%
Earnings Change		(\$1,816)	(\$1,700)	(\$1,600)
Credential Rate		58%	67%	68%
<u>Older Youth</u>				
Entered Employment Rate		71%	81%	83%
Retention Rate		80%	84%	85%
Earnings Change		\$3,000	\$3,700	\$3,800
Credential Rate		46%	58%	60%
<u>Younger Youth</u>				
Skill Attainment		74%	74%	74%
Diploma Rate		59%	75%	75%
Retention Rate		58%	75%	75%
<u>Customer Satisfaction</u>				
Participants		70%	76%	77%
Employers		70%	76%	77%

E. Administrative Provisions

1. Appeals Process for Regional Designations: A unit or combination of units of general local governments may request designation as a local workforce investment area under the Workforce Investment Act of 1998. If that request is not granted by the Governor, an appeal can be made to the State Workforce Development Board within 30-days of the non-designation. The appeal must include the rationale as to why the designation decision should be rescinded.

If the State Workforce Development Board does not grant designation on appeal, the decision may be appealed to the Secretary of Labor within 30 days of the written notice of denial. The appeal must be submitted by certified mail, return receipt requested, to the Secretary, U.S. Department of Labor, Washington, D.C. 20210. The appellant must establish that it was not accorded procedural rights under the appeal process described in the state plan or establish that it meets the requirements for designation in the Workforce Investment Act of 1998 section 116(a)(2) or 116(a)(3). The Secretary will take into account any comments submitted by the State Workforce Investment Board.

2. Non-Discrimination: Policies that the State of Iowa has provided to ensure compliance with the non-discrimination required by the WIA statute are provided in Attachment 8.

XI. ASSURANCES

1. Iowa assures that it will establish, in accordance with section 184 of the Workforce Investment Act, fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through the allotments made under section 127 and 132. (§112(b)(11).)
2. Iowa assures that it will comply with section 184(a)(6), which requires the Governor to, every two years, certify to the Secretary, that –
 - a. Iowa has implemented the uniform administrative requirements referred to in section 184(a)(3);
 - b. Iowa has annually monitored local areas to ensure compliance with the uniform administrative requirements as required under section 184(a)(4); and
 - c. Iowa has taken appropriate action to secure compliance with section 184(a)(3) pursuant to section 184(a)(5). (§184(a)(6).)
3. Iowa assures that the adult and youth funds received under the workforce Investment Act will be distributed equitably throughout the State, and that no local areas will suffer significant shifts in funding from year to year during the period covered by this plan.
4. Iowa assures that veterans will be afforded employment and training activities authorized in section 134 of the Workforce Investment Act, and the activities authorized in chapters 41 and 42 of Title 38 US code. Iowa assures that it will comply with the veterans priority established in the Jobs for Veterans Act. (38 USC 4215)
5. Iowa assures that the Governor shall, once every two years, certify one local board for each local area in the State. (§117(c)(2).)
6. Iowa assures that it will comply with the confidentiality requirements of section 136(f)(3).
7. Iowa assures that no funds received under the workforce Investment Act will be used to assist, promote or deter union organizing. (§181(b)(7).)
8. Iowa assures that it will comply with the nondiscrimination provisions of section 188, including an assurance that a Methods of Administration has been developed and implemented (§188.)
9. Iowa assures that it will collect and maintain data necessary to show compliance with the nondiscrimination provisions of section 188. (§185.)
10. Iowa assures that it will comply with the grant procedures prescribed by the Secretary (pursuant to the authority at section 189© of the Act), which are necessary to enter into grant agreements for the allocation and payment of funds under the Act. The procedures

and agreements will be provided to Iowa by the ETA Office of Grants and Contract Management and will specify the required terms and conditions and assurances and certifications, including, but not limited to, the following:

- General Administrative Requirements:
 - ❑ 29 CFR part 97 – Uniform Administrative Requirements for State and Local Governments (as amended by the Act)
 - ❑ 29 CFR part 96 (as amended by OMB Circular A-133) – Single Audit Act
 - ❑ OMB Circular A-87 – Cost Principles (as amended by the Act)
 - Assurances and Certifications:
 - ❑ SF 424B – Assurances for Non-construction Programs
 - ❑ 29 CFR part 37 – Nondiscrimination and Equal Opportunity Assurance (and regulation) 29 CFR § 37.20
 - ❑ CFR part 93 – Certification Regarding Lobbying (and regulation)
 - ❑ 29 CFR part 98 – Drug Free Workplace and Debarment and Suspension Certifications (and regulation)
 - Special Clauses/Provisions: Other special assurances or provisions as may be required under Federal law or policy, including specific appropriations legislation, the workforce Investment Act, or subsequent Executive or Congressional mandates.
11. Iowa certifies that the State Employment Security Administrator has certified the Wagner-Peyser Act Plan, which is part of this document.
 12. Iowa certifies that veterans' services provided with Wagner-Peyser Act funds will be in compliance with 389 U.S.C. Chapter 41 and 20 CFR part 1001.
 13. Iowa certifies that Wagner-Peyser Act-funded labor exchange activities will be provided by merit-based public employees in accordance with DOL regulations.
 14. Iowa assures that it will comply with the MSFW significant office requirements in accordance with 20 CFR part 653.
 15. Iowa certifies it has developed this Plan in consultation with local elected officials, local workforce boards, the business community, labor organizations and other partners.
 16. As a condition to the award of financial assistance from the Department of Labor under Title I of WIA, the grant applicant assures that it will comply fully with the nondiscrimination and equal opportunity provisions of the following laws:
 - Section 1898 of the Workforce Investment Act of 1998 (WIA), which prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and against beneficiaries on the basis of either citizenship/status as a lawfully admitted immigrant

authorized to work in the United States or participation in any WIA Title I-financially assisted program or activity;

- Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the basis of race, color and national origin;
- Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities;
- The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age; and
- Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in education programs.

The grant applicant also assures that it will comply with 29 CFR part 37 and all other regulations implementing the laws listed above. This assurance applies to the grant applicant's operation of the WIA Title I-financially assisted program or activity, and to all agreements the grant applicant makes to carry out the WIA Title I-financially assisted program or activity. The grant applicant understands that the United States has the right to seek judicial enforcement of this assurance.

17. Iowa assures that funds will be spent in accordance with the Workforce Investment Act and the Wagner-Peyser Act and their regulations, written Department of Labor Guidance implementing these laws, and all other applicable Federal and State laws and regulations.

WORKFORCE DEVELOPMENT BOARD MEMBERS

EMPLOYER REPRESENTATIVES

Dean Hicks
Earlham Savings Bank
7300 Lake Drive
West Des Moines, IA 50265
(515) 223-4753 (W)
(515) 987-1808
(515) 225-3298 (Fax)
(515) 707-2736
E-Mail: ebank@earlhambank.com

*Norma Schmoker
2290 170th Street
Fort Dodge, IA 50501
(515) 573-4632 (H)
(515) 573-4632* (Fax)

Sally Falb
604 N. Vine
West Union, IA 52175
(563) 283-1105 (W)
(563) 422-5353 (H)
(563) 422-5353 (Fax)
(563) 380-0455 (cell)
E-mail: sfalb@alpinecom.net

Rosa Bailey, Human Resources Director
American Pop Corn Company
One Fun Place
3432 Alpine Ct.
Sioux City, IA 51106
(712) 239-1232 (W)
(712) 276-4425 (H)
(712) 239-1268 (Fax)
E-mail: rosab@jollytime.com

* Chair

**Vice-Chair

EMPLOYEE REPRESENTATIVES

Ben Duehr
2013 Hummingbird Drive
Dubuque, IA 52002
(563) 556-7689 (H)
(563) 589-5151 (W)
(563) 557-8725 (Fax)

**Ernie L. Nelson
120 26th Street, Apt. #7
Fort Madison, IA 52627
(319) 372-2906 (H)

Ken Sagar
Iowa Federation of Labor, AFL-CIO
2000 Walker Street, Suite A
Des Moines, IA 50317
(515) 264-8616 (H)
(515) 262-9571 (W)
(515) 262-9573 (Fax)
E-mail: ifl@iowaafcio.org

Vicki Duchene
2103 South 8th Avenue East
Newton, IA 50208
(641) 792-7036 (H)
(641) 792-7000 (W)

NON-PROFIT WORKFORCE DEVELOPMENT ORGANIZATION REPRESENTATIVE

Jean Logan, Executive Director
Community Action Agency of Siouxland
2700 Leech Avenue
Sioux City, IA 51106
(712) 239-7252 (H)
(712) 274-1610, Ext. 204 (W)
(712) 274-0368 (Fax)
(712) 251-1301 (cell)
E-mail: jlogan@caasiouxland.org

WORKFORCE DEVELOPMENT BOARD MEMBERS

EX-OFFICIO NON-VOTING

Dr. Tahria K. Hira
Assistant to the President for External Relations and
Executive Administration
Iowa State University
1750 Beardshear Hall
Ames, IA 50011-2035
(515) 294-7239 (W)
(515) 294-0565 (fax)
(515) 570-4105 (cell)
E-mail: tkhira@iastate.edu

Jan Varner
204 Navaho Drive
Keokuk, IA 52632
(319) 524-6122, ext.10 (W)
(319) 524-2499 (H)
(319) 524-6244 (Fax)
E-mail: hjvarner@interl.net

Steve Ovel
Kirkwood Community College
P.O. Box 2068
Cedar Rapids, IA 52406
(319) 363-4569 (H)
(319) 398-5466 (W)
(319) 398-5432 (Fax)
(319) 533-4539 (Cell)
E-mail: sovel@kirkwood.edu

Nancy Williams, President
AIB College of Business
2500 Fleur Drive
Des Moines, IA 50321
(515) 246-5370 (W)
(515) 244-6773 (fax)
(515) 554-4404 (cell)
E-mail: nancyw@aib.edu

Representative Dave Jacoby
2308 Northridge
Coralville, IA 52241
(319) 358-8538 (H)
(319) 254-2272
E-mail: david.jacoby@legis.state.ia.us

Representative Willard Jenkins
6 Winter Ridge Rd.
Waterloo, IA 50701
(319) 233-7383 (H)
(515) 752-4643 (W)
(515) 281-8758 (In Session Fax)
(319) 233-8048 (Home fax)
E-mail: willard.jenkins@legis.state.ia.us
E-mail: wjenkin@mchsi.com (home)

Senator William Dotzler
2837 Cedar Terrace Drive
Waterloo, IA 50702-4513
(319) 296-2947 (H)
(319) 233-3049 (W)
(319) 233-0405 (Fax)
(515) 281-8758 (In Session Fax)
E-mail: bill.dotzler@legis.state.ia.us
E-mail: bdotzler@athenet.net

Senator Petricia Ward
P.O. Box 27026
West Des Moines, IA 50265
(515) 281-3371 (W)
(515) 221-3945 (H)
E-Mail: pat.ward@legis.state.ia.us

3/05

WIA HANDBOOK - SECTION 4

Regional Workforce Investment Board

The Regional Workforce Investment Board (RWIB), appointed by the Governor in consultation with the Chief Elected Official (CEO) board, plays a leading role in establishing policy for the region's Workforce Development Center system. The RWIB also selects the WIA service providers, directs the activities of the Youth Advisory Council, and shares responsibility for many other duties with the CEO board, including selection of the Coordinating Service Provider and overseeing the regional Workforce Development Center system's service delivery. See the Roles and Responsibilities Section for more information regarding the RWIB.

RWIB Membership Composition

Each RWIB shall have five voting members from business and five voting members from labor, and shall include one county elected official, one city official, one representative of a school district, and one representative of a community college.

Members appointed to a RWIB may send an alternate if the member cannot attend a meeting. The alternate shall not have voting privileges or be counted as present for the member in determining whether or not a quorum is present.

The board may appoint ex officio, nonvoting members.

The board must solicit periodic, regular and meaningful input from disabled persons, older workers, regional or local economic development groups, and the region's Workforce Development Center System Partners. To meet this requirement, it is recommended that the board appoint the following four ex officio members:

- 1) A disabled person nominated by an organization that represents or serves disabled persons.
- 2) An older worker nominated by a senior community service employment program service provider.
- 3) An individual nominated by a regional or local economic development organization.
- 4) An individual nominated by the regional Workforce Development Center partners.

If ex officio members representing the four groups identified above are not appointed, the RWIB must describe an alternate process to gain input from these groups in its Regional Customer Service Plan.

This regional plan must also describe how input will be solicited from other community based organizations that have an interest in workforce development, provide workforce development services in the region and are not a Workforce Development Center system partner, and are not represented on the RWIB by either a voting or non-voting member.

Nomination Process for Voting Members

The following procedures must be used in soliciting nominations for voting members on the Regional Workforce Investment Board:

- 1) All nominations for members representing business must be made by local or regional business organizations or trade associations. Business representatives should be owners of businesses, chief executive or operating officers of business and other business executives or employers with optimum policymaking or hiring authority and represent businesses with employment opportunities that reflect the employment opportunities of the region.

Attachment 2

- 2) All nominations for members representing labor must be made by appropriate local federations of labor, union councils, or state federations of labor.
- 3) All nominations for members which represent education must be made by local school districts or community colleges, respectively.
- 4) All nominations from business, labor and education must be made in writing with the signed approval of the required nominating organization.
- 5) All nominations for members who are county or city officials shall be made individually or collectively by the region's county boards of supervisors or mayors and city councils respectively.
- 6) The overall membership of the board must be balanced by gender and political affiliation consistent with Iowa code section 69.16 and 16.16A. To the extent possible the members should represent all counties within a region served by the board and both voting and non-voting members should represent persons with disabilities, minorities and older workers of the region.
- 7) Existing and future RWIB members do not have to be re-nominated unless required to do so by the CEO board of a region.
- 8) Nominations are valid for an unlimited time period unless the Local Elected Officials of a region set a specific time limit.

Additional Region 8 Requirements

In Region 8, which consists of the counties of Audubon, Carroll, Crawford, Greene, Guthrie, and Sac, 14 members of the Regional Workforce Investment Board will be selected cooperatively by the Governor and the CEO board, using the nomination and appointment processes described above. These 14 members of the Regional Workforce Investment Board will constitute the board required under Chapter 84 of the Code of Iowa.

The Region 8 RWIB also must include:

- 1) At least two representatives of community-based organizations (including organizations representing individuals with disabilities or veterans, in regions where such organizations are present);
- 2) At least two representatives of economic development agencies;
- 3) A representatives of the Workforce Development Center system partners; and
- 4) Individuals or representatives of other appropriate entities, including entities representing individuals with multiple barriers to employment and other special populations, as determined by the Chief Elected Official board.

The majority of the Regional Workforce Investment Board members must represent business, and the chairperson must represent the business sector.

Appointment Process

The process for making appointments to the local board is:

- 1) The CEO board or its designee must solicit nominations from the required business, labor, education, and governmental entities upon notification of a RWIB vacancy.
- 2) The nominating organization must complete and submit the nomination form to the CEO board.

Attachment 2

- 3) The CEO board must submit a list of nominees for a board vacancy to IWD. As future vacancies occur, the CEO board must submit nominations within 45 days of the vacancy. The CEO board must submit at least two nominees for each vacancy to IWD at the address listed below for the Governor's review:

Iowa Workforce Development Center Administration
150 Des Moines Street
Des Moines, IA 50309
Attn: Enterprise Development Team

- 4) The Governor will review the list, add or delete nominees from the list and return the revised list to the CEO board within 45 days of receipt of the list by the department.
- 5) If the CEO board fails to submit nominations for a vacancy within the 45-day time period or fails to reach agreement locally on appointments to the board, the governor may appoint a person to fill the vacancy.
- 6) The CEO board will review the revised list and make the final selection of a person to fill a vacancy from the revised list. If the revised list of candidates is not acceptable to the board, the CEO board may submit new candidates to the Governor for consideration and repeat the process until a candidate is appointed,
- 7) The CEO board will send an appointment letter to the person selected to fill the vacancy on behalf of the chief elected officials and the governor within 30 days of receipt of the revised list and send a copy of the letter to IWD at the above address.
- 8) If the CEO board fails to submit nominations for a vacancy within the 45-day time period or fails to reach agreement locally on appointments to the board, the Governor may appoint a person to fill the vacancy.

Reappointment Process

The appointment process outlined above shall be used to fill RWIB vacancies. However, RWIB members representing business, labor or education who were originally appointed to the Regional Advisory Board do not have to be re-nominated as outlined in the Appointment Process subsection above, unless required to do so by the region's CEO board.

State of Iowa
Iowa Workforce Development
Workforce Development Center Administration
150 Des Moines Street
Des Moines, IA 50309

This is an application for INITIAL approval to participate as an Eligible Training Provider under the Workforce Investment Act (WIA) of 1998, Public Law 105-220, Department of Labor, Employment and Training Administration, 20 CFR Parts 652-671. Approval as an Eligible WIA Training Provider does not represent an endorsement or accreditation of the programs offered by the Eligible Training Provider.

INSTRUCTIONS: Applications are to be completed by entering the applicable information at:
www3.iwd.state.ia.us/wiatest/trainingproviders.nsf/

The signature page of this site must be printed, signed, and submitted to the contact person identified on this website for your region. Eligible training providers without Internet access should complete the application below and submit it to the local Regional Workforce Investment Board (RWIB) Chair.

PART I – GENERAL INFORMATION

Date of Application _____

1. Name of Institution _____
2. Address _____
3. Telephone Number _____ Fax Number _____
5. Type of Institution _____
6. Name of Chief Executive Officer _____
7. Name of Financial Aid Officer _____
- Telephone Number _____ Email address _____
8. Is your organization a post-secondary educational institution eligible under the Higher Education Act (HEA) or registered under the National Apprenticeship Act (NAA)? ☐ Yes ☐ No

PART II (a) – PROGRAM INFORMATION

9. Please provide a brief description of each program for which you are applying, including:

- A. Program Name _____
- B. A brief program description _____

- C. Length of Program _____ Total Credit Hours Required _____

- PROGRAM COSTS:**

- Please use additional pages if necessary.**

PART II (b) – ELIGIBLE TRAINING PROVIDER GENERAL INFORMATION

If you are a post-secondary education institution eligible under the Higher Education Act (HEA) or registered under the National Apprenticeship Act (NAA), please place a checkmark next to the description that applies to your institution and submit **only** these two (2) pages for initial certification. Prior to the expiration of this initial certification, you will receive instructions regarding subsequent eligibility.

- ## CERTIFICATION

I _____ certify that I am the _____ of the training
Name Title

institution named herein and further certify that the information contained in this application is true and correct. All supporting documentation is true and factual.

Signature

Date _____

FOR RWIB USE ONLY

Date Received by RWIB

Date Approved by RWIB

Application Date

Date RWIB Submitted to IWD

Authorized RWIB Signature _____

FOR IWD USE ONLY

Date Received by IWD

Date Program Certified by IWD

Authorized IWD Signature

The Institution will be notified regarding initial approval by Iowa Workforce Development.

All other applicants must complete the following information and Part III – Part VI:

1. Date Institution was founded: _____
2. Number of years the institution has been in continuous operation: _____
3. Is the institution accountable to a policy or governmental board? ☐ Yes ☐ No
If so, what board? _____
Please attach a member list.
4. Does each program lead to a degree or certification? Please explain: _____

PART III – FINANCIAL INFORMATION

1. Is the institution financially sound and able to satisfy potential liabilities arising from its participation?
Please enclose a certified financial statement and the institution's most recent auditor's report.
2. Attach a schedule of fees for in-state and out-of-state tuition, if applicable.
3. Does the institution have a refund policy for the unused portion of tuition, fees, and other charges in the event the enrollee withdraws or discontinues at any time prior to completion?
Please state your refund policy: _____

PART IV – FACILITIES

Describe your facility. Provide narrative that describes at a minimum a description on each of the following:

- The number of buildings
- Handicap accessibility
- Availability of suitable training equipment
- Compliance with fire, building and safety codes, including off-campus locations or other sites

PART V – ORGANIZATION OF THE TRAINING INSTITUTION

Please provide a description of each of the following:

- The number of persons employed
- Current number of students enrolled
- Class size to instructor ratio
- School Calendar
- Availability of Transcripts

PART VI – INITIAL PERFORMANCE INFORMATION REQUIRED ON EACH PROGRAM

1. Program completion rate for all individuals participating in the applicable program conducted by the training provider. A program completer is a person who has:
 - i. obtained a certificate, degree or diploma; or
 - ii. received credit for completing the program; or
 - iii. received a passing grade in the program; or
 - iv. finished the required curriculum of the program

Which criteria listed above (i) – (iv) do you use to define a completer?

☐ (i) ☐ (ii) ☐ (iii) ☐ (iv)

2. Percentage of all individuals who obtained unsubsidized employment. The training provider must specify:
 - how the information was obtained
 - what percentage of all student's data was collected
 - what year is being used
3. Average hourly wages of all students who obtained unsubsidized employment: \$ _____

WIA HANDBOOK - SECTION 30 - Procurement

This section contains the standards and guidelines for the procurement of supplies, property and services for selected IWD programs. These standards are furnished to ensure that such materials and services are obtained efficiently, economically, and in compliance with applicable federal and state regulations. All references to “contractor” within this section are applicable to grantees, subrecipients, Coordinating Service Providers, and WIA Service Providers.

Elements of a Procurement System

A contractor receiving federal or state funds from IWD and conducting its own procurement, must have written procurement procedures. The procedures must be consistent with applicable state and local laws and regulations; the procurement standards set forth in this section; and the regulations as described in:

- ◆ 29 CFR Part 95 for institutions of higher education and non-profit organizations; or
- ◆ 29 CFR Part 97 for State and local government organizations.

State and federal procurement laws and regulations, including the procurement standards set forth in this section, take precedent over any contractor procurement policies and procedures.

The written procurement policies and procedures of each contractor must include, at a minimum, the following elements:

- ◆ Authority to take procurement actions;
- ◆ Standards of conduct;
- ◆ Methods of procurement;
- ◆ Solicitation procedures;
- ◆ Documentation requirements.

Each of these elements is described in detail below.

Procurement Standards

Procurement must be conducted with complete impartiality, without preferential treatment of anyone, in a manner that provides maximum open and free competition, and must be documented.

Contractors must conduct competitive procurement except under the circumstances listed under the Solicitation subsection below as part of the *Sole Source (Non-competitive) Procurement* item. Modifications to a contract that substantially change the statement of work of that contract require competitive procurement.

The following situations are examples of restriction of competition that must be avoided:

1. Placing unreasonable requirements on firms or organizations in order for them to qualify to do business;
2. Requiring unnecessary experience and excessive bonding;
3. Writing requirements for a procurement so narrowly that they favor a potential service provider or vendor;
4. Noncompetitive pricing practices between firms or organizations or between affiliated companies or organizations;
5. Noncompetitive awards to consultants that are on retainer contracts;
6. Organizational conflict of interest;
7. Specifying only a “brand name” product, instead of allowing “an equal” product to be offered and describing the performance of other relevant requirements of the procurement;
8. Overly restrictive specifications; and

9. Any arbitrary action in the procurement process.

The contractor's procurement system must include policies relating to all of the standards in this section. In most cases, these standards can be adopted as written. However, in some cases, such as *Authority to Take Procurement Actions*, decisions must be made at the local level and developed into written policies.

Procurement Policy Elements

A. Authority to Take Procurement Actions

The authority policies must include the position title(s) of the individual(s) with the authority to perform the following functions:

- 1) Initiation of procurement actions;
- 2) Selection of entities for receipt of awards;
- 3) Signing purchase agreements, contracts and modifications thereof; and
- 4) Termination of contracts.

Different individuals may have authority for different types or dollar amounts of procurement. Where Local Elected Officials or members of the RWIB have a full or partial role in procurement, that role must be described as part of the policies under *Authority to Take Procurement Action*.

B. Standards of Conduct

Standards of conduct for procurement must include policies regarding the following:

1) Conflict of Interest

An individual in a decision-making capacity, including staff, RWIB members, CEO board members, and other council members, must not engage in any activity including the design, selection, award or administration of a purchase agreement or contract supported by any funds under contract with the fiscal agent, sub-recipient, or designated service provider by IWD, if a conflict of interest, real or apparent, would be involved. This is described in more detail in the Financial Management section of the handbook.

2) Confidentiality and Non-Disclosure

Information must not be disclosed to anyone who is not directly involved in the procurement process relating to the intent to implement a procurement, the amount of funds available, or any related data, until that information is made known to all bidders through a notification of the intent to solicit or dissemination of a Request for Proposal (RFP) or Request for Quote (RFQ).

Technical and cost/price information from any proposal must not be disclosed to anyone not officially involved in the procurement process while the procurement is still in progress.

Certain technical or proposal information that a bidder has designated as proprietary or trade secret, and with which the fiscal agent, sub-recipient, or designated service provider concurs, must not be disclosed to other bidders, even after the award is made and publicized.

The number or names of bidders must not be disclosed to anyone not officially involved in the procurement process until the contract is awarded and the decision is made public.

3) Disclosure

The announcements of solicitation requirements, including proposal evaluation factors that will be used to assess bids or proposals, must be released to all bidders at the same time.

Information given in response to a question from one bidder must be shared with all known potential bidders.

4) Prohibited Actions of Staff or Council Members

Individuals involved in the procurement processes that are predisposed either for or against any potential service provider or vendor must withdraw from the procurement process.

Individuals involved in a procurement process must not solicit nor accept any payment, gratuity, favor, offer of employment, kickback or anything of monetary value from fiscal agents, sub-recipients, designated service providers, service providers or vendors, or potential service providers or vendors.

Staff and council members involved in the procurement process must not attempt to influence procurement decisions of individuals involved in the procurement process.

Any individual involved in a procurement process must not be employed by any bidder for that same procurement.

5) Penalties, Sanctions and Disciplinary Actions

Contractors must provide for penalties, sanctions, or other disciplinary actions for violations of standards of conduct by the contractor's officers, staff, or agents, council members, or by bidders, sub-recipients, service providers, vendors or their agents.

Any attempt by a potential contractor or vendor to make any payment, gratuity, or offer of employment or kickbacks to any individual involved in a procurement process must lead to disqualification of that entity's proposal.

C. Methods of Procurement

There are three types of allowable procurement procedures: Request for Quotations (RFQ), Request for Proposals (RFP), and sole source.

1) Request for Quotations (RFQ)

An RFQ is used when the supplies, property, or service to be procured have been specifically defined and price quotes or bids are being sought to provide such supplies, property, or service.

When an RFQ method is used, the RFQ must provide a clear and accurate description of the technical requirements for the supplies, property, or services to be procured, as well as identifying all requirements which the bidders must fulfill and all other factors to be used in evaluating bids or proposals. It must also designate a period of performance or the date by which supplies, property or services must be delivered.

All quotes received on any RFQ, whether written or verbal, must be documented regardless of the amount of the proposed purchase.

2) Request for Proposals (RFP)

An RFP is appropriate when the supplies, property, or services to be procured have not been specifically defined and proposals that further describe what will be provided are being sought, and will be evaluated on technical and other factors in addition to cost, price, and timely delivery. Proposals received for which a direct comparison of price and cost for the same or substantially equivalent types of supplies, property or services cannot be made, must be treated as Sole Source procurement.

A Request for Proposal must contain:

- a) A clear and accurate description of the technical requirements for the supplies, property, or services to be procured, the period of performance or date by which the supplies, property or services must be delivered, and the requirements for the location and method of delivery;
- b) The contract clauses that will be included in any resulting contract or purchase order;
- c) Certifications, assurances, and representations that the potential service provider will have to make including, at a minimum:
 - i) An assurance that to the best of the bidder's knowledge and belief, the cost data are accurate, complete and current at the time of the proposal;
 - ii) A guaranteed period of time for which the proposal is good;
 - iii) An assurance that the bidder is not debarred or suspended;
 - iv) An assurance that the bidder will comply fully with the nondiscrimination and equal opportunity provisions of fiscal agent, designated service provider, or sub-recipient; and
 - v) An assurance of timely delivery.
- d) Instructions on how to prepare and submit the proposal including any required format;
- e) All requirements which the bidder must fulfill;
- f) Evaluation factors and criteria that will be used to judge the proposals; and
- g) Time lines for submittal and review of the proposal and the manner in which late proposals will be treated.

3) **Sole Source (Non-competitive) Procurement**

Sole source or non-competitive procurement may be used only when competitive procurement processes are not feasible or they may have a negative impact upon the program. In those limited situations as delineated below, procurement may be conducted on a negotiated rather than a competitive basis.

Except for the circumstances described in items (a) through (e) below, a written solicitation with a statement of work must be issued for all sole source procurement and a written proposal including cost and price must be obtained from the potential service provider or vendor. In all instances except item (a) below (i.e., single purchases of supplies, equipment or services totaling less than \$2,000 in the aggregate), the use of sole source procurement must be justified and documented in writing as described in "Documentation" of this subsection. For circumstances described in item (a) below, the fiscal agent, designated service provider, or sub-recipient must ensure that the purchase price is reasonable in relation to similar products or services which are available; however, additional written documentation of that determination is unnecessary. In such cases, the fiscal entity's usual fiscal records will provide sufficient documentation.

The circumstances or situations under which sole source procurement is allowable are limited to the following:

- a) Any single purchase of supplies, equipment, or services totaling less than \$2,000 in the aggregate;
- b) Single participant Work Experience, Vocational Exploration, Limited Internship and On-the-Job Training contracts;
- c) Enrollment of individual participants in Institutional Skills Training;
- d) All other individual training or services contracts involving only one participant, except where such contracts include the purchase of property. Such property must be purchased through competitive procedures;

- e) Activities and services, other than those in (b) and (d) above, which are provided by the fiscal agent , designated service provider, or sub-recipient when a determination of demonstrated performance clearly documents the staff's ability to provide the training or services;
- f) A modification to a contract that does not substantially change the statement of work of that contract;
- g) After solicitation of an adequate number of sources only one acceptable response was received;
- h) Any single service or workshop costing less than \$5,000 identified in the regional Customer Service Plan;
- i) Supplies, property and services which have been determined to be available from a single source; and
- j) An emergency situation for which IWD or applicable governing boards provides written approval.

D. Solicitation

Solicitation is the process by which offers or bids are obtained from potential sub-recipients, service providers or vendors.

In order to ensure that an adequate number of bids or proposals are solicited, each fiscal agent, designated service provider, and sub-recipient must maintain a list of potential service providers or vendors. The list should include as many potential service providers or vendors as possible and can be developed by collecting the names of interested parties from "intent to solicit" meetings and publicity and from directories of appropriate service providers and vendors. The list must be updated on a periodic basis by removing defunct service providers and vendors and service providers and vendors that have not demonstrated any interest for a given time. Potential service providers and vendors that have shown interest must be added to the list regardless of their geographical location. The list must include community-based organizations, small and minority businesses, and women's business enterprises that normally provide employment and training related services.

All potential service providers or vendors on the fiscal agent's, designated service providers, and sub-recipient's list must be given the opportunity to submit a bid or proposal regardless of geographical location.

All procurements for any supplies, property, or services with an anticipated value of \$10,000 or more in the aggregate, must be publicly advertised.

E. Documentation

All steps of the procurement process must be documented **in accordance with 29 CFR Part 95 or 29 CFR Part 97 (as appropriate)** including solicitations, selection process, contract negotiations and award. In addition, all documents (e.g., proposal review forms, cost analysis work papers, etc.) developed during the procurement process must be maintained as required in the Record Keeping and Maintenance subsection.

If procurement requires IWD approval, a copy of that approval must also be retained.

For competitive procurement through RFQs and RFPs, the following must be documented:

- 1) The name and title of the individual initiating the procurement process;
- 2) The date the procurement process was begun (i.e., The date of the decision to procure.);
- 3) Information relating to the amount and source(s) of available funds;
- 4) The description of the supplies, property, or services to be procured;

Attachment 4

- 5) A list of service providers who received direct solicitations, and any publications which were made; or, for RFQs where verbal solicitations were conducted, the name of the individual contacted and the name of the individual making the contact;
- 6) The prices or proposals received;
- 7) For RFPs, a copy of the request which was released, a copy of all proposals received, and the evaluations of proposals received;
- 8) The name(s) of bidder(s) selected for award;
- 9) When the lowest cost offer is not accepted, additional justification for the selection;
- 10) The name, title and signature of the individual with final approval authority.

In addition to the items listed above, Sole Source procurement, other than those described under item (a) on page 7 of this subsection, must also include the following documentation:

- 11) The justification for why the sole source method was used;
- 12) A description of the proposed service provider's or vendor's unique or special capacity to fill the requirement;
- 13) A description of actions that were taken to obtain more than one quote or offer, where applicable; and
- 14) Any other facts that support the use of sole source.

WIA HANDBOOK - Regional Monitoring Responsibilities

The Workforce Investment Act and its implementing regulations assign responsibilities for monitoring to a variety of administrators, policy makers and operators within the WIA delivery system. These monitoring requirements are intended to promote the effective utilization of public funds while providing procedures to ensure that the objectives of the program are met.

The establishment and maintenance of a monitoring system is necessary to qualify for a waiver or imposition of sanctions for some types of negative audit and monitoring findings.

This section outlines the monitoring responsibilities of all WIA Service Providers. Iowa Workforce Development's procedures are outlined in the Performance and Compliance Review subsection of this Volume.

Required Components of a Monitoring System

Monitoring Activities

The monitoring system must ensure that participant and contract monitoring activities are conducted as outlined in this subsection.

FOR ALL PROGRAMS:

Once during each program year, the WIA Service Provider must monitor each contract written for \$25,000 or more. The WIA Service Provider must also monitor the following:

- 1) A random sample of ten percent (10%) of all non-OJT financial contracts under \$25,000 which start during the quarter;
- 2) A random sample of ten percent (10%) of non-financial activity of service contracts which start during the quarter; and
- 3) A random sample of ten percent (10%) of all participant files of participants enrolled or transferred into adult, dislocated worker and youth programs during the quarter.

These random samples must be drawn quarterly and the monitoring activity for the quarter must be completed at the end of the subsequent quarter.

In addition, all on-the-job training contracts must be monitored during the second thirty-day period of activity under the contract and at least every 90 days thereafter.

Sampling Procedures

The monitoring system must have procedures for drawing random samples from the participant file universe and from the contract universe. These procedures must ensure that the sampling is random and that the requirements are met.

FOR ALL PROGRAMS:

- 1) Participant Files
 - a) The monitoring sample must be drawn after the end of the quarter being sampled and monitored but no later than thirty days (30) after the last day of the quarter being sampled;
 - b) A participant concurrently enrolled in more than one program must be included in the universe for each program in which the participant is enrolled;
 - c) A participant must be included in the sample only in the quarter the participant is enrolled; and
 - d) A participant who has been transferred must be included in the sample for the quarter during which the transfer occurred.

2) Contracts

- a) The ten percent (10%) monitoring sample of all non-OJT contracts below \$25,000 must be drawn after the end of the quarter being sampled and monitored but no later than thirty (30) days after the quarter being sampled; and
- b) A contract must be included in the sample for the quarter within which its effective date falls.

The monitoring system must be designed to review compliance with all applicable State and Federal laws and regulations. Following are the compliance review requirements for completing the two basic types of monitoring: participant file and contract monitoring. The following requirements apply to all programs.

3) Participant File Monitoring

Participant file monitoring must include a review of :

- a) The participant record including a review of the eligibility determination;
- b) A sample of direct payments to the participant;
- c) A sample of time and attendance records; and
- d) Compliance with Federal and State regulations and the Customer Service Plan.

4) Contract Monitoring

Contract monitoring, including OJT contracts, must include a review of:

- a) The service provider record;
- b) A sample of fiscal transactions;
- c) Payroll and time and attendance records, as appropriate;
- d) Compliance with the Federal and State regulations and the Customer Service Plan;
- e) Compliance with equal opportunity regulations;
- f) Compliance with Service Plan; and
- g) Compliance with the Work Statement, Training Outline, and all other contract provisions contained in the Contract.

Monitoring Reports

The monitoring system must include a method of documenting that the monitoring activity has taken place. In order to meet the documentation requirement, a monitoring report on each contract or participant monitored must be prepared and maintained along with documentation of corrective action required and taken. Any findings and corrective action to be taken must be transmitted to the monitored entity in writing. If the monitoring results in no findings requiring corrective action, this information may be communicated at the exit interview or in writing.

If a concurrently enrolled participant is drawn in the sample for more than one program for the same quarter, only one monitoring report, which includes both monitoring activities, may be completed.

Summary of Monitoring Reports

A summary report of monitoring activity must be completed for all programs. These summary reports must be maintained and available for Iowa Workforce Development use in its program compliance review process.

FOR ALL PROGRAMS:

A summary report must be completed for each program monitored for each quarter by the end of the subsequent quarter and must include:

- 1) A list of all participants enrolled or transferred into a program during the quarter;
- 2) A list of all participants that were monitored during the quarter;
- 3) A list of all contracts for \$25,000 or more with effective dates that fall within the quarter;

- 4) A list of all OJT contracts that were active during the program year with effective dates;
- 5) A list of all non-OJT contracts (financial and non-financial) for less than \$25,000 with effective dates that fall within the quarter;
- 6) A list of all non-OJT contracts that were monitored during the quarter; and
- 7) A list of OJT contracts that were monitored including the dates monitored.

In place of the lists in items (a), (b), and (d) above, a computer generated list derived from the program provided by Iowa Workforce Development can be used. The above required lists may be included in one document or can be separate documents.

Policies, Procedures and Timeframes

A monitoring plan containing written policies, procedures and timeframes for the following must be developed and described in the Customer Service Plan:

- 1) Monitoring activities;
- 2) Reporting;
- 3) Random sampling of participant files and contracts;
- 4) Corrective action; and
- 5) Sanctions.

WIA HANDBOOK - SECTION 24 - State Complaint Procedures

This section contains the procedure to be used to file a WIA-related complaint with the State.

Complaints may be filed with Iowa Workforce Development to resolve alleged violations of the Workforce Investment Act (WIA), Federal or State regulations, grant agreement, contract or other agreements under the Act.

Iowa Workforce Development's complaint procedure may also be used to resolve complaints with respect to audit findings, investigations or monitoring reports.

Complaints alleging discrimination must be filed as per that specific subsection of this section. (See Complaints Alleging Discrimination -- RESERVED.)

Grievances and complaints from customers and other parties related to the regional Workforce Development Center system and local WIA programs should be filed through local complaint procedures. Any party which has alleged violations at the local level, and filed a complaint at the local level, may request review by Iowa Workforce Development if that party receives an adverse decision or no decision within 60 days of the date the complaint was filed at the local level.

Filing a complaint

Any interested person, organization or agency may file a complaint.

Time Limits

Complaints must be filed within 90 calendar days of the alleged occurrence.

Content of the Complaint

Complaints must be clearly portrayed as such and meet the following requirements:

- 1) Complaints must be legible and signed by the complainant or the complainant's authorized representative;
- 2) Complaints must pertain to a single subject, situation or set of facts and pertain to issues over which the State has authority (unless appealed from the local level);
- 3) The name, address and phone number (or TDD number) must be clearly indicated. If the complainant is represented by an attorney or other representative of the complainant's choice, the name, address and phone number of the representative must also appear in the complaint;
- 4) Complaints must state the name of the party or parties complained against and, if known to the complainant, the address and telephone number of the party or parties complained against;
- 5) Complaints must contain a clear and concise statement of the facts, including pertinent dates, constituting the alleged violations;
- 6) Complaints must cite the provisions of WIA regulations, grant agreements, or other agreements under WIA believed to have been violated, if applicable;
- 7) Complaints must state the relief or remedial action(s) sought; and
- 8) Copies of documents supporting or referred to in the complaint must be attached to the complaint; and
- 9) Complaints must be addressed to:

Complaint Officer
Division of Workforce Development Center Administration
Iowa Workforce Development
150 Des Moines Street
Des Moines, Iowa 50309

Acknowledgement of a Complaint and Notice of Opportunity for a Hearing

A complaint is deemed filed with the State when it has been received by the Complaint Officer and meets the requirements outlined above. Upon receipt of a complaint, Iowa Workforce Development will send a copy of the complaint and a letter of acknowledgement and notice to the complainant and any persons or entities cited in the

complaint within seven calendar days. The letter of acknowledgement and notice will contain the filing date and notice of the following opportunities:

- 1) The opportunity for informal resolution of the complaint at any time before a hearing is convened; and
- 2) The opportunity for a party to request a hearing by filing with the Complaint Officer within seven calendar days of receipt of the acknowledgement of the complaint.
 - a) Failure to file a written request for a hearing within the time provided constitutes a waiver of the right to a hearing, and a three-member panel will rule on the complaint based upon the information submitted;
 - b) If a hearing is requested within seven calendar days of receipt of the acknowledgement of the complaint, the hearing will be held within 20 calendar days of the filing of the complaint;
 - c) The opportunity for a party to submit written evidence, statements, and documents in a time and manner prescribed by the complaint officer.

Complaint Resolution

The Complaint Officer shall convene a review panel of three agency staff members to review complaints within 20 calendar days of the receipt of the complaint. The review panel may, at its discretion, request oral testimony from the complainant and the parties complained against.

Within 30 calendar days of the receipt of the complaint, the review panel will issue a written decision including the basis for the decision, and, if applicable, remedies to be granted. The decision will detail the procedures for a review by the Director if the complainant is not satisfied with the decision.

Party(ies) may appeal the decision by filing an appeal with the Complaint Office no later than 10 calendar days from the issuance date of the decision. The Complaint Officer will forward the complaint file to the Director for review.

If no appeal of the decision is filed within the time provided, the decision shall become the final agency decision.

Informal Settlement

A complaint may, unless precluded by statute, be informally settled by mutual agreement of the parties any time before a hearing is convened. The settlement must be effected by a settlement agreement or a statement from the complainant that the complaint has been withdrawn or resolved to the complainant's satisfaction. The Complaint Officer must acknowledge the informal settlement and notify the parties of the final action. With respect to the specific factual situation which is the subject of controversy, the informal settlement constitutes a waiver by all parties of the formalities to which they are entitled under the terms of the Iowa Administrative Procedure Act, Iowa Code Chapter 17A, WIA, and the rules and regulations under WIA.

Hearings

Upon receipt of a timely request for a hearing, the Complaint Officer will assign the matter to a panel. The panel will give all parties at least seven days written notice either by personal service or certified mail of the date, time and place of the hearing. The notice may be waived in case of emergency, as determined by the panel, or for administrative expediency upon agreement of the interested parties.

The notice of hearing will include:

- 1) A statement of the date, time, place, nature of the hearing;
- 2) A brief statement of the issues involved; and
- 3) A statement informing all parties of their opportunities at the hearing;
- 4) Opportunity for the complainant to withdraw the request for hearing before the hearing;
 - a) Opportunity to reschedule the hearing for good cause, provided the hearing is not held later than 20 days after the filing of the complaint;
 - b) Opportunity to be represented by an attorney or other representative of choice at the complainant's expense;

- c) Opportunity to respond and present evidence and bring witnesses to the hearing;
- d) Opportunity to have records or documents relevant to the issues produced by their custodian when such records or documents are kept by or for the state, contractor or its subcontractor in the ordinary course of business and where prior reasonable notice has been given to the Complaint Officer;
- e) Opportunity to question any witnesses or parties;
- f) The right to an impartial review panel; and
- g) A final written agency decision shall be issued within 60 days of the filing of the complaint.

Appeal to the Director

An appeal to the Director must be filed within 10 calendar days from the issuance date of the decision and include:

- 1) The date of filing the appeal; and
- 2) The specific grounds upon which the appeal is made. Those provisions upon which an appeal is not requested will be considered resolved and not subject to further review.
- 3) Appeals must be addressed to:

Complaint Officer
Division of Workforce Development Center Administration
Iowa Workforce Development
150 Des Moines Street
Des Moines, Iowa 50309.

Upon receipt of an appeal, the Complaint Officer will forward the complaint file to the Director. The Complaint Officer will give written notice to all parties of the filing of the appeal and set a deadline for submission of all written evidence, statements, and documents.

The Director will consider all timely filed appeals, exceptions, statements, and documents at the time the decision is reviewed. With the consent of the Director, each party may present oral argument.

The Director may adopt, modify or reject the review panel's decision or remand the case to the review panel for the taking of such additional evidence and the making of such further findings of fact, decision and order as the Director deems necessary.

Decision by Director

Upon completing the review of the review panel's decision, the Director shall issue and forward to all parties a final written decision no later than 60 days after the filing of the initial complaint.

Department of Labor Review

The Director's decision is final unless the Secretary exercises the authority of federal review in accordance with 20 CFR 667. Federal level review may be accepted by the Secretary if the complaint meets the requirements of 20 CFR 667. Upon exhaustion of the State's grievance and complaint procedure, or where the Secretary has reason to believe that the State is failing to comply with the WIA, the state plan, or the region's customer service plan, the Secretary must investigate the allegation or belief and determine within 120 days after receiving the complaint whether such allegation or complaint is true.

Review of Local Level Complaints

Any party receiving an adverse decision at the local level may file an appeal within 10 calendar days to the IWD Complaint Officer. In addition, any complaint filed at the local level with no decision within 60 days of the date of the filing may be reviewed by IWD. The request to review the complaint must be filed with the Complaint Officer within 15 calendar days from the date on which the decision should have been received.

The appeal or request for review must comply with the procedures as prescribed in this section for filing a complaint. The parties involved will be afforded the rights and opportunities as prescribed in this section for filing a state level complaint.

Remand of Grievances and Complaints

The Complaint Officer will review all WIA complaints filed with IWD within seven (7) calendar days. If the subject and facts presented in the complaint are most relevant to local policy, the Complaint Officer will remand the complaint to the Coordinating Service Provider of the appropriate Workforce Investment Region for resolution.

Failure to file the complaint or grievance in the proper venue does not negate the complainant's responsibility for filing the complaint in the appropriate time frames.

October 28, 2003

WORKFORCE DEVELOPMENT FIELD INFORMATION MEMO NO: 02-12 Change #1**TOPIC:** Incentive Award and Sanction Policy

1. **Purpose:** To communicate revisions to the Incentive Awards and Sanction policy applicable to the Workforce Investment Act (WIA) programs.
2. **Background:** Field Memo 02-12 established policies related to incentive awards and sanctions to be applied on the basis of achievement levels on the WIA performance measures. Those policies are applicable to performance achievement in Program Years 2001 and 2002. This change to Field Memo 02-12 revises certain of those policies and is effective for performance achievement in Program Year 2003 and beyond, or until further revisions are made.
3. **Substance:** The following policies will govern the award of incentive funds or application of sanctions for regions based upon their level of performance on the seventeen WIA measures.

A. Evaluating Performance for Incentives and Sanctions

For each Core performance measure, the percentage by which each Region met its negotiated standard will be calculated. For example, if a Region had an 80% negotiated performance standard for a specific measure and the actual achievement was 80%, they would have achieved 100% of their negotiated standard on that measure. Likewise, if the achievement on that measure were only 40%, they would have achieved 50% of their negotiated standard.

The percentage for the performance measures will be clustered by program area: adults, dislocated workers, youth, and customer satisfaction. An average level of achievement will be calculated for each of the four clusters using the scores for each measure in each program area and in the customer satisfaction group.

B. Eligibility for Incentive Awards

In determining eligibility for incentive awards, only the seventeen federally required core and customer satisfaction measures will be considered.

To be eligible for an incentive award, a Region must meet two criteria: 1) for any program area or the customer satisfaction group, each measure within that group must be achieved at a minimum level of 80% of the negotiated standard, and 2) the average of all measures within that group must be at least 100% of the negotiated standards.

C. Amount of Incentive Award

The amount of funds available for distribution for incentive awards will be 50% of the Statewide Activity Set-Aside funds, and any carry-over incentive funds from the previous year (see below). The funds will be distributed as follows:

Adult Pool	20%
Dislocated Worker Pool	20%
Youth Pool	20%
Customer Satisfaction Pool	10%
Super Pool	30%

Regions may qualify to receive incentive funds from any of the four basic pools: adult, dislocated worker, youth, or customer satisfaction. The funds in each of these pools will be distributed equally among all regions that qualify for that pool. Regions will also qualify to share equally in the funds reserved in the Super Pool if they have achieved 80% of the negotiated standard on all seventeen performance measures and have a 100% overall average achievement on all measures.

In any event, Regions may not receive a total incentive award greater than 25% of their total WIA formula budget for the Program Year in which the award is made. Any incentive funds not awarded due to this restriction will carry-over to the incentive award pools in the following year.

D. Failing to Meet the Negotiated Standards

Negotiated standards of performance have been established for each of the seventeen performance measures in each Region of the State. The lowest acceptable level of achievement is 80% of the established standard on each measure. If a Region falls below the threshold of 80% on any of the performance measures, the Region may be subject to sanction.

E. Unacceptable Performance for One Year

The first year that a Region achieves unacceptable levels of performance will result in the provision of technical assistance from IWD. This assistance may require the development of a performance improvement plan that contains the following elements:

- Designation of which performance indicators will be improved through the implementation of the plan;
- Analysis of the performance deficiency, including a description of the problem solving techniques that will be used to determine the likely causes of the poor performance, and/or identification of those causes;
- Identification of the corrective actions that the Region will take to improve performance; and
- Timetable for implementing the corrective action plan.

F. Unacceptable Performance in Two Consecutive Years

If performance is unacceptable for two consecutive years for the same performance measure, sanctions may be imposed. Possible sanctions include, but are not limited to, the following

- Requiring the development and implementation of a corrective action plan;
- Prohibiting the use of eligible providers or partners identified as achieving a poor level

of performance;

- Disapproving or requiring modifications to the Regional Customer Service Plan;
- Requiring the re-negotiation of the Memorandum of Understanding (MOU);
- Requiring the designation of an alternate Coordinating Service Provider (CSP);
- Requiring the designation of alternate Adult, Dislocated Worker, or Youth Service Providers;
- Requiring the appointment and certification of a new Regional Workforce Investment Board (RWIB); and
- Re-designating the Region.

IWD will determine the appropriate sanction on a case-by-case basis, depending on the severity of the poor performance.

SECTION 27 - Equal Employment Opportunity

The purpose of this part is to implement the nondiscrimination and equal opportunity provisions of the Workforce Investment Act of 1998 (WIA), which are contained in section 188 of WIA. Section 188 prohibits discrimination on the grounds of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for beneficiaries only, citizenship or participation in a WIA Title I - financially assisted program or activity. 29 CFR Part 37 clarifies the application of the nondiscrimination and equal opportunity provisions of WIA and provides uniform procedures for implementing them.

No individual in the United States may, on the ground of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for beneficiaries only, citizenship or participation in any WIA Title I - financially assisted program or activity, be excluded from participation in denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any WIA Title I-funded program or activity.

To Whom This Section Applies

- 1) Recipients*;
- 2) Applicants/claimants;
- 3) Participants;
- 4) Employment applicants;
- 5) Employees;
- 6) Grant applicants.

* Recipient means any entity to which financial assistance under WIA Title I is extended, either directly from the Department (DOL) or through the Governor or another recipient (including any successor, assignee, or transferee of a recipient), but excluding the ultimate beneficiaries of the WIA Title I-funded program or activity.

This section does not apply to:

- 1) Programs or activities that are financially assisted by the Department exclusively under laws other than Title I of WIA, and that are not part of the Workforce Development Center delivery system (including programs or activities implemented under, authorized by, and/ or financially assisted by the Department under, JTPA);
- 2) Contracts of insurance or guaranty;
- 3) The ultimate beneficiary to this program of Federal financial assistance;
- 4) Federal procurement contracts, with the exception of contracts to operate or provide services to Job Corps Centers; and
- 5) Federally-operated Job Corps Centers; The operating Department is responsible for enforcing the nondiscrimination and equal opportunity laws to which such Centers are subject.

Prohibited Actions

For the purposes of this section, "prohibited ground" means race, color, religion, sex, national origin, age, political affiliation or belief, and for beneficiaries only, citizenship or participation in any WIA Title I-financially assisted program or activity.

- 1) A recipient must not, directly or through contractual, licensing, or other arrangements, on a prohibited ground:

- a) Deny an individual any aid, benefits, services, or training provided under a WIA Title I-funded program or activity;
 - b) Provide to an individual any aid, benefits, services, or training that is different, or is provided in a different manner, from that provided to others under a WIA Title I-funded program or activity;
 - c) Subject an individual to segregation or separate treatment in any matter related to his or her receipt of any aid, benefits, services, or training under a WIA Title I-funded program or activity;
 - d) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any aid, benefits, services, or training under a WIA Title I-funded program or activity;
 - e) Treat an individual differently from others in determining whether he or she satisfies any admission, enrollment, eligibility, membership, or other requirement or condition for any aid, benefits, services, or training provided under a WIA Title I-funded program or activity;
 - f) Deny or limit an individual with respect to any opportunity to participate in a WIA Title I-funded program or activity, or afford him or her an opportunity to do so that is different from the opportunity afforded others under a WIA Title I-funded program or activity;
 - g) Deny an individual the opportunity to participate as a member of a planning or advisory body that is an integral part of the WIA Title I-funded program or activity; or
 - h) Otherwise limit on a prohibited ground an individual in enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving any WIA Title I-financially assisted aid, benefits, services, or training.
- 2) A recipient must not, directly or through contractual, licensing, or other arrangements:
- a) Aid or perpetuate discrimination by providing significant assistance to an agency, organization, or person that discriminates on a prohibited ground in providing any aid, benefits, services, or training to registrants, applicants or participants in a WIA Title I-funded program or activity; or
 - b) Refuse to accommodate an individual's religious practices or beliefs, unless to do so would result in undue hardship, as defined in section 37.4.
- 3) In making any of the determinations listed in paragraph (4) of this section, either directly or through contractual, licensing, or other arrangements, a recipient must not use standards, procedures, criteria, or administrative methods that have any of the following purposes or effects:
- a) Subjecting individuals to discrimination on a prohibited ground; or
 - b) Defeating or substantially impairing, on a prohibited ground, accomplishment of the objectives of either:
 - i) The WIA Title I-funded program or activity; or
 - ii) The nondiscrimination and equal opportunity provisions of WIA or this part.
- 4) The determinations to which this paragraph applies include, but are not limited to:
- a) The types of aid, benefits, services, training, or facilities that will be provided under any WIA Title I-funded program or activity;
 - b) The class of individuals to whom such aid, benefits, services, training, or facilities will be provided; or
 - c) The situations in which such aid, benefits, services, training, or facilities will be provided.
- 5) Paragraphs (3) and (4) of this section apply to the administration of WIA Title I-funded programs or activities providing aid, benefits, services, training, or facilities in any manner, including, but not limited to:
- a) Outreach and recruitment;
 - b) Registration;
 - c) Counseling and guidance;
 - d) Testing;
 - e) Selection, placement, appointment, and referral;
 - f) Training; and

- g) Promotion and retention.
- 6) A recipient must not take any of the prohibited actions listed in paragraphs (3) and (4) of this section either directly or through contractual, licensing, or other arrangements.
- 7) In determining the site or location of facilities, a grant applicant or recipient must not make selections that have any of the following purposes or effects:
 - a) On a prohibited ground:
 - i) Excluding individuals from a WIA Title I-financially assisted program or activity;
 - ii) Denying them the benefits of such a program or activity; or
 - iii) Subjecting them to discrimination; or
 - b) Defeating or substantially impairing the accomplishment of the objectives of either:
 - i) The WIA Title I-financially assisted program or activity; or
 - ii) The nondiscrimination and equal opportunity provisions of WIA or this part.
- 8) A recipient must not permit participants to be employed or trained in sectarian activities.
- 9) This paragraph applies to any facility that is, or will be, primarily used or inherently devoted either:
 - a) For sectarian instruction; or
 - b) As a place of worship,
 - i) A recipient must not permit participants to be employed or trained in any way to:
 - Construct any part of such a facility,
 - Operate any part of such a facility, or
 - Maintain any part of that facility.
- 10) If a facility is not primarily or inherently devoted to sectarian instruction or religious worship, a recipient may permit the use of WIA Title I funds to employ participants to maintain the facility, if the organization that operates the facility is part of a program or activity that provides services to participants.
- 11) The exclusion of an individual from programs or activities limited by Federal statute or Executive Order to a certain class or classes of individuals of which the individual in question is not a member is not prohibited by this part.

Methods of Administration (Reserved)

Additional information will be provided pending clarification from the Department of Labor.

Equal Opportunity Officer

The following entities must identify an individual to serve as the Equal Opportunity Officer as described in 29 CFR part 37:

- 1) IWD State EO officer and Recipient's designated EO officers
- 2) recipients *and* their staffs, including SESAs, State agencies administering WIA Title 1, SDA grant recipients, Substate grantees, service providers, any other public or private agency receiving funds directly or Indirectly under WIA Title I-financially assisted State programs.

State Equal Opportunity Officer

The State's Equal Opportunity Officer serves as liaison with the Civil Rights Center of the Department of Labor and develops and carries out the State's Methods of Administration (MOA). He or she ensures recipient compliance with EO provisions.

Attachment 8

The state's Equal Opportunity officer is Harvey Andrews. He is located in the Employee Services section of the Customer Services Division of Iowa Workforce Development in Des Moines at 1000 East Grand Avenue. Phone number (515)-281-3316.

An Equal Opportunity Officer is responsible for coordinating a recipient's obligations under 29 CFR Part 37.

The Equal Opportunity Officer responsibilities include, but are not limited to:

- 1) Serving as the recipient's liaison with the Civil Rights Center;
- 2) Monitoring and investigating the recipient's activities, and the activities of the entities that receive WIA Title I funds from the recipient, to make sure that the recipient and its subrecipients are not violating their nondiscrimination and equal opportunity obligations under WIA Title I and this part;
- 3) Reviewing the recipient's written policies to make sure that those policies are nondiscriminatory;
- 4) Developing and publishing the recipient's procedures for processing discrimination complaints and making sure that those procedures are followed;
- 5) Reporting directly to the appropriate official (including, but not limited to, the State WIA Director, Governor's WIA Liaison, Job Corps Center Director, SESA Administrator, or LWIA grant recipient) about equal opportunity matters;
- 6) Undergoing training at the recipient's expense to maintain competency, if the Director (DOL, CRC) requires him or her, and/or his or her staff, to do so; and
- 7) If applicable, overseeing the development and implementation of the recipient's Methods of Administration.

Discrimination Complaints

Any person who believes that either he or she, or any specific class of individuals, has been or is being subjected to discrimination prohibited by WIA or this part, may file a written complaint, either by him/herself or through a representative.

A complainant may file a complaint with either the recipient or the Director.

Generally, a complaint must be filed within 180 days of the alleged discrimination. However, for good cause shown, the Director may extend the filing time. The time period for filing is for the administrative convenience of CRC, and does not create a defense for the respondent.

Each complaint must be filed in accordance with section 25 of this handbook:

Note: It is the responsibility of all WIA Title I service providers of programs, services, and activities to develop an internal complaint procedure in accordance with the requirements of 29CFR Part 37.76.